

187660



COMPRESSED GAS ASSOCIATION, INC.

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September 4, 2002

Docket Management System
U.S. Department of Transportation
Room PL 401,
400 Seventh Street, S.W.
Washington, DC 20590-0001

Subject: RSPA-01-10373 (HM-220D) - 17

Gentlemen:

This letter represents an appeal by the Compressed Gas Association (CGA) to Docket RSPA-01-10373 (HM-220D) as required by 49 CFR §§ 106.110 and 106.115.

The CGA, founded in 1913, represents over one-hundred and fifty member companies world wide in the development and promotion of safety standards and safe practices in the industrial gas industry. The Association represents all facets of the industry – manufacturers, distributors, suppliers, and transporters. Through the committee system CGA creates technical specifications, safety standards, training and educational materials; and also works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations.

CGA members produce, market, and distribute industrial gases and cryogenic liquids such as carbon dioxide, ethylene, hydrogen, nitrogen, nitrous oxide, and oxygen as well as various specialty gases, many classified as poison gases. Accordingly our members have a strong interest in domestic and international regulations governing these products.

CGA can find no justification for an effective date just over sixty days from the initial notice in the Federal Register. NPRM HM-220 was open for over three years before it was finally withdrawn. HM-220D was issued as a Final Rule and provided no opportunity for public comment. To expect compliance of final rule HM-220D in such a short time is unreasonable. This Final Rule should be withdrawn and converted to a Notice of Proposed Rulemaking (NPRM) with sufficient time to review and comment on the proposal.

PRESIDENTIAL RECORDS ACT
SEARCHED SERIALIZED INDEXED
RECORDED

HM-220D Appeal

A brief review of this final rule by some of our members revealed the following significant issues that must be addressed:

§171.6(e). Some of what concerns our members is not what is in HM-220D as much as what is not. For instance, the 1994 issue of CGA publication C-3 is referenced in §171.6(e) of this rulemaking. CGA updated this publication in 2000 and again in 2002.

In addition, the volumetric expansion test contained in our publication C-1 is often referred to by DOT Enforcement during an audit but C-1 is not referenced in this rulemaking.

§173.301(f)(2). This section is particularly onerous to CGA and its members. In today's technology it is not possible to assure the PRD is in communication with the vapor phase. In liquefied compressed gas it is common practice to ship cylinders and tubes in a horizontal position. To design, test, implement and distribute a PRD that would at all times be in communication with the vapor phase would require several years and, considering the confined space in which the PRD would be contained, may not be practical or even possible.

If allowed to take effect this rule will, on October 1, 2002, outlaw millions of cylinders, many already in transit, with virtually no increase in safety. While the cost of such an action may be calculated it can not be done in so short a time frame. Considering it will affect the fire protection Industry, the refrigerant gas industry, Specialty Gas and Electronics Industries to name a few industries that control millions of cylinders it is not difficult to estimate the cost of compliance to be in tens of millions of dollars and possibly cause some companies to cease operations.

Further, tests were conducted by CGA, with DOT's participation, during the late 1970's validating the CGA formulas presently listed in CGA Pamphlet S-1.1 indicating PRD's were sufficient to relieve the cylinder (in the liquid phase) during a bonfire test. Due to the size of the report, over 130 pages, this report will be forwarded to RSPA under separate cover.

§173.301(f)(3). This section requires all PRDs in the DOT 3 series cylinders have a set pressure with a tolerance of "plus zero minus 10%" of test pressure. This requirement does not take into account that some PRDs are fuse metal devices designed to function in excess heat and at a point unrelated to the cylinder's test pressure.

We believe the more correct wording would be: "For DOT 3, 3A, 3AA, 3AL, 3AX, 3AAX, 3B or 3BN cylinder, from the first requalification due on and after October 1, 2002, the set pressure of the pressure relief device incorporating a CG-1, CG-4 or CG-5 pressure relief device shall not exceed the test pressure with a tolerance of plus zero to

HM-220D Appeal

Minus 10%. This requirement does not apply if a CG-2, CG-3, CG-7 or CG-9 device is used on the aforementioned cylinders".

§173.301(g)(1). The fifth sentence should be changed to read as follows:

"Each cylinder must be individually equipped with a pressure relief device as required in paragraph (f) of this section, except that pressure relief devices on manifolded horizontal cylinders, which are mounted on a motor vehicle or in a framework, may be selected as to type, location and quantity according to the lowest marked pressure limit of an individual cylinder in the manifolded unit, provided the pressure relief devices selected for the manifolded unit have been tested in accordance with CGA Pamphlets S-1.1 and S-7".

This revision would allow tube trailer and tube container manufacturers to assemble the equipment using a common type of safety relief device with the same pressure setting.

§173.301(h). This section is ambiguous. We believe RSPA intended to exempt MC and B type cylinders in acetylene service. However, the wording in this section implies all acetylene cylinders do not require valve protection. We believe this section must be rewritten to be clearly understood.

§173.302(b)(1). Elastomers and other non-metallic components are used in the sealing and operation of valves used in oxygen service. If this rulemaking takes effect as written it would create a major disruption in the supply of medical oxygen to hospitals and medical professionals. We believe it was the intent of RSPA to specify the metallic requirements similar to our recommendations in CGA publication V-9. This section should be rewritten as follows:

"Each valve body or the metallic portions of a valve that may come in contact with the oxygen being transported in the cylinder must be constructed of brass or stainless steel".

§177.840(a)(1). This new section requiring that all PRDs be ported in the vapor phase of the cylinder will have a very serious negative impact. The compressed gas industry physically can not comply with this requirement. See our comments on §173.301(f)(2).

§180.211(a) and (b). It is unclear if the intent of this section is to apply the same guideline for repairing newly manufactured cylinders as is required for non-manufacturers who repair old cylinders. This needs to be clarified.

These comments were provided after only a brief review. We believe there may be other issues not as apparent as these in HM-220D that could have a serious impact on the gas industry. The Compressed Gas Association believes this rulemaking represents a major change in the regulations requiring a much more thorough review and can not

HM-220D Appeal.

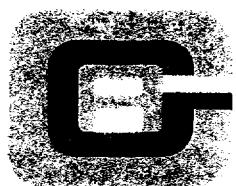
stress enough that Final Rule HM-220D must be withdrawn and reissued as a Notice of Proposed Rulemaking (NPRM) with a 120 to 180 day comment period.

The CGA respectfully appreciates the opportunity to present this appeal and looks forward to a favorable response from RSPA.

Very truly yours,
COMPRESSED GAS ASSOCIATION

A handwritten signature in black ink, appearing to read "R. J. McGrath".

R. J. McGrath
Technical Manager



GENERAL GAS EQUIPMENT COMPANY
500 FIFTH AVENUE • NEW YORK NY 10110 • (212) 364-1130

TEST OF CYLINDERS EQUIPPED WITH
PURPOSELY UNDERSIZED PRESSURE RELIEF DEVICES

SUPPLEMENT

TO

FIRE TEST DATA IN SUPPORT

OF

S-1.1 FORMULAE

OCTOBER 24, 1979

REVISED 1/15/81

TABLE OF CONTENTS

- A. Introduction
- B. Summary
- C. Data Package and Fire Test Background Information
 - 1. Data Point G
 - 2. Data Point K
 - 3. Data Point W

A. INTRODUCTION

This document supplements the report titled "Fire Test Data In Support of S-1.1 Formulae". Whereas that report summarized successful fire tests applicable to cases where the valve safety devices were sized to minimum S-1.1 requirements, this document covers cases where purposely undersized safety devices resulted in cylinder ruptures. It is planned that this supplemental document becomes a repository for fire test data associated with cylinder ruptures. There is strong evidence to show herein that fire tests resulting in cylinder ruptures have been due to improperly sized safety devices; i. e., devices sized below S-1.1 requirements.

B. SUMMARY

Data Point G - A 125 lb. W_c cylinder ruptured. It was equipped with two valves which together were capable of protecting about 64 lb. W_c per S-1.1.

Data Point K - A 50 lb. cylinder ruptured, it was equipped with one valve capable of protecting 31.2 lbs. W_c per S-1.1.

Data Point W - A 50 lb. cylinder ruptured with a valve capable of protecting 35.2 lbs. W_c per S-1.1. Paragraph 4.8. Significantly this test was repeated by a successful follow-up test using a Condon valve #64-666A designed to meet S-1.1 requirements. This test is reported as Data Point 6 on Page 69 of "Fire Test Data In Support of S-1.1 Formulae".

125 Lb. Disposable - Fire Test

February 10, 1969

File

R. B. Schaefer

L95, R. Jernberg, B of E - C. Schultz

At the Bureau of Explosive Lab, in Rahway, an initial fire test was completed February 6, 1969 unsuccessfully. It is our conclusion the cylinder was not equipped with adequate safety venting area. We further opine that thin wall vessels may require more venting capability than conventional types, because localized heating in a fire is more possible due to the thin wall and poorer heat dissipation, which if followed by localized annealing and premature burst.

Specimen tested was 125.2 lb. water capacity cylinder of nominal minimum wall 0.063 inches per WPS drawing A10669 equipped with 1 vapor to 1 liquid (diptube) nylon valve per Superior 6405 which have a rated flow capacity capable of handling about 31.2 lb. water capacity. Cylinder was charged at 125 lb. net with R22. It had been pretested at 350 psi and estimated burst was to be about 750.

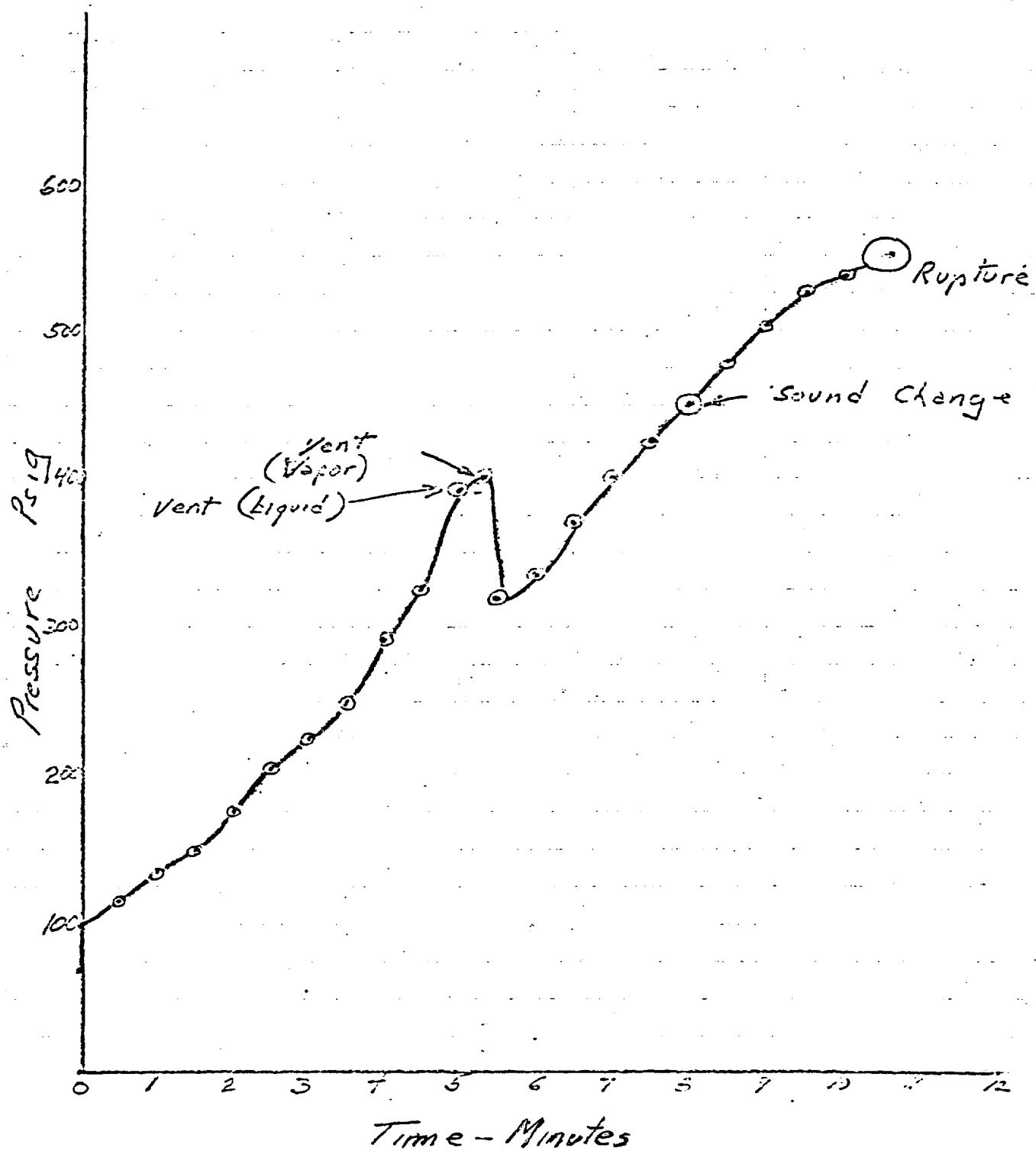
Test Set Up - Standard B of E fire test in explosion proof test. Approximately 2 cubic feet of kindling and a gallon of kerosine. Cylinder was gauged through a valve barely cracked open to a 1,000 lb. gauge located approximately 50 feet away.

Results - See pressure plot SK RBS 2669A. Cylinder ruptured at about 550 psi bursting into three pieces. Both valves were functioning fully at about 400 psi, but were inadequate to keep the pressure from rising. They operated for 5½ minutes, and we believe the safety operating parts blew out at 450 psi.

SK RBS 2669 is a gauge survey of the cylinder parts. The burst started at point 11 and was a normal burst for this type of tank.

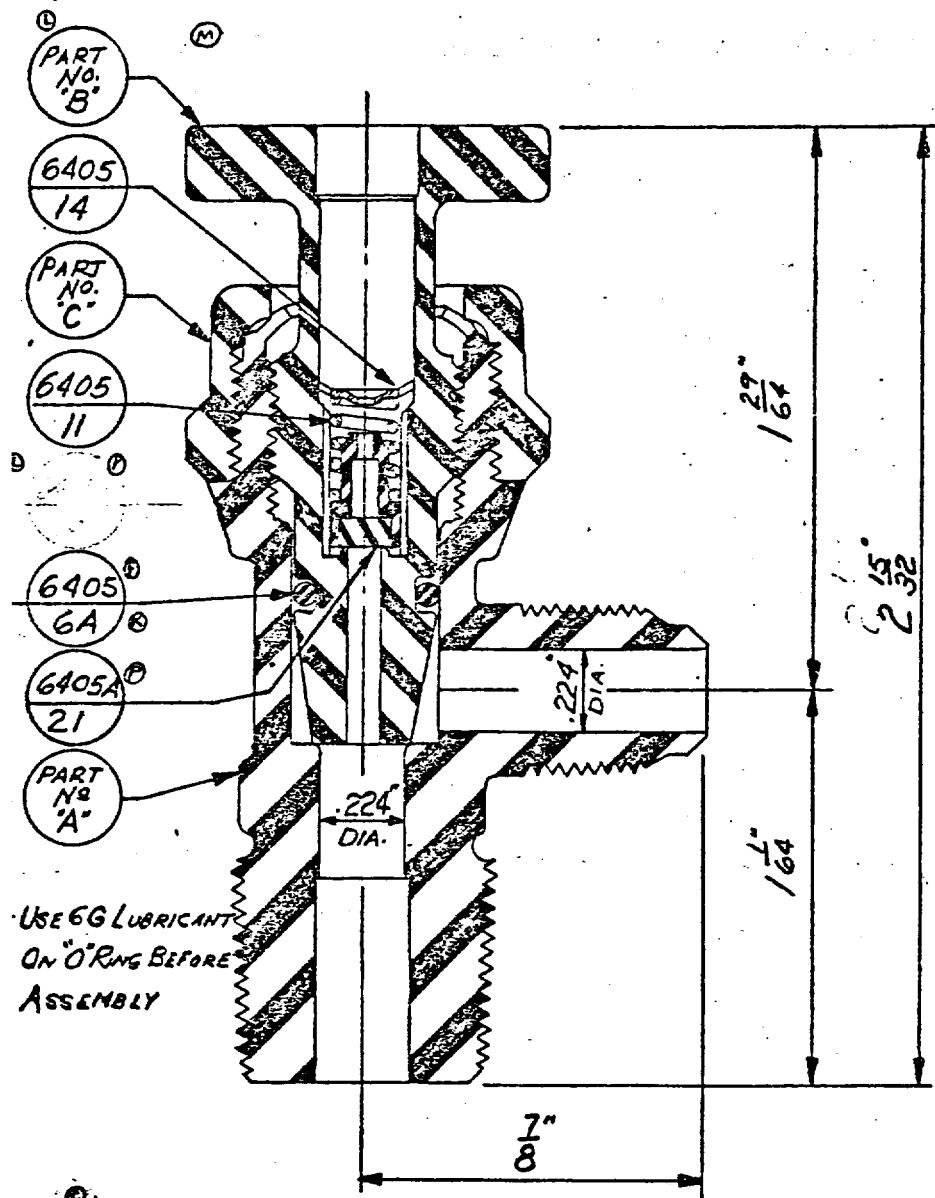
A.B.Schechter, R.Jernberg, E.Hinderson, C.Schultz 125°C CYMR 2/1/5
A.

Temp 40°C



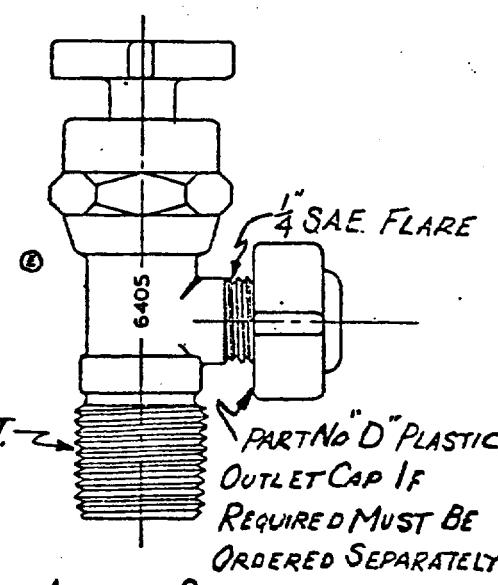
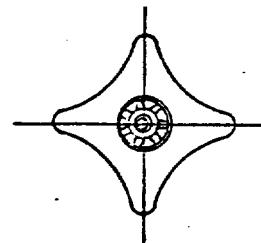
6405-G	GREEN	P6405-1G	P6405A-2G	P6405-3G	6405-20G
6405-BK	BLACK	P6405-1BK	P6405A-2BK	P6405-3BK	9002-20BK ^(N)
6405-R	RED	P6405-1R	P6405A-2R	P6405-3R	—

^(P)P6405A-21 SUB ASSEMBLY INCLUDES PARTS 6405A-13 & 6405-17



NOTE:

VALVE TO BE SHIPPED IN OPEN POSITION



ACTUAL SIZE

TYPE SD 84 SAFETY DEVICE (DWG No 1955) APPROVED BY BUREAU OF EXPLOSIVES
LETTER, 272-1-611, BA-730, W-D, DATED Oct. 9, 1967 FOR CYLINDERS
CONTAINING LIQUEFIED COMPRESSED GAS HAVING A MAXIMUM WATER CAPACITY
OF 31.2 POUNDS

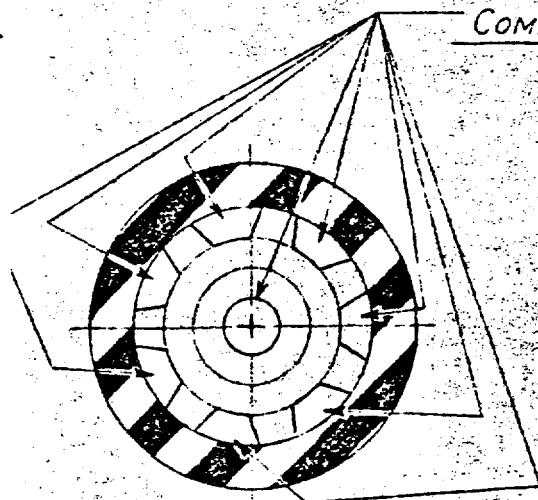
PATENT PENDING

^(P)SAFETY DEVICE SETTING 360-480 P.S.I.

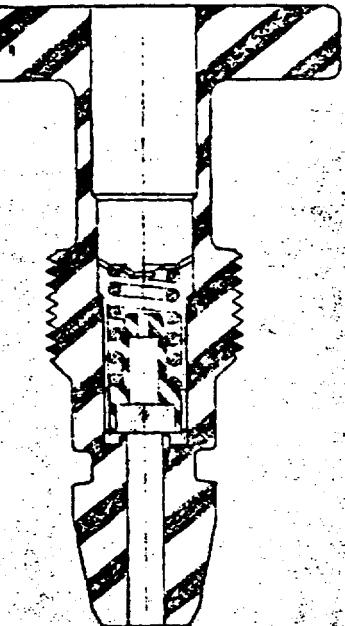
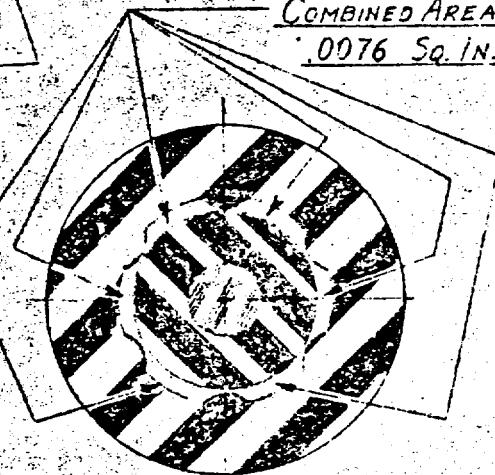
TOLERANCE FOR DIMENSIONS OTHER THAN THOSE SPECIFIED		SUPERIOR VALVE COMPANY WASHINGTON, PA.			DRAWN BY G.ALBERT	DATE 7-6-67	DRAWING NO. 6405
DIA.	LENGTH	PLASTIC VALVE FOR 25# THROW AWAY REFRIGERANT CONTAINERS			CH'KD. BY W.WY	SCALE 24 1/0"	
MINAL $\pm .002$	LENGTH $\pm .005$						
OPTIONAL $\pm .005$	DEPTH $\pm .010$						
PART NO. OR CATALOG NO. SEE TABLE							

REVISIONS							
DATE 1955-6405A-21	ADDED SUB ITEM 7/1/67	DATE 6405A-13	DATE 6405-17	DATE	DATE	DATE	DATE
DATE 6405-17							

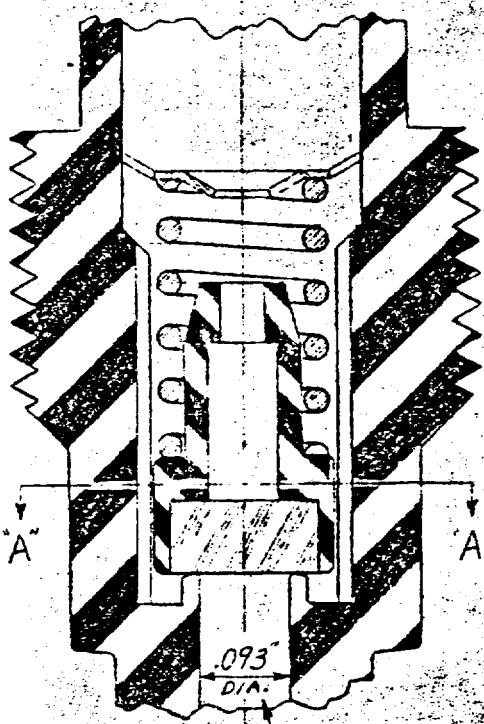
COMBINED AREA .0138 Sq. IN.



COMBINED AREA
.0076 Sq. IN.



SCALE 2X1



AREA .0069 Sq. IN.

① TYPE SD84 SAFETY DEVICE APPROVED BY BUREAU
OF EXPLOSIVES LETTER, 272-1-611, BA-730, W-D,
DATED OCT. 9, 1967 FOR CYLINDERS CONTAINING
LIQUEFIED COMPRESSED GAS HAVING A MAXIMUM
WATER CAPACITY OF 31.2 POUNDS

ERANCE FOR DIMENSIONS
ER THAN THOSE SPECIFIED

DIA. LENGTH
MAX. $\pm .002$ $\pm .005$
OPTIONAL $\pm .005$ $\pm .010$

SUPERIOR VALVE COMPANY
WASHINGTON, PA.

TYPE SD84 SAFETY DEVICE

DRAWN BY
H. HOLLIS
DATE
9-13-57

DRAWING NO.

1955

CH'KD. BY
J. M. MITT
SCALE
5X1

PART NO. OR CATALOG NO.

REVISIONS

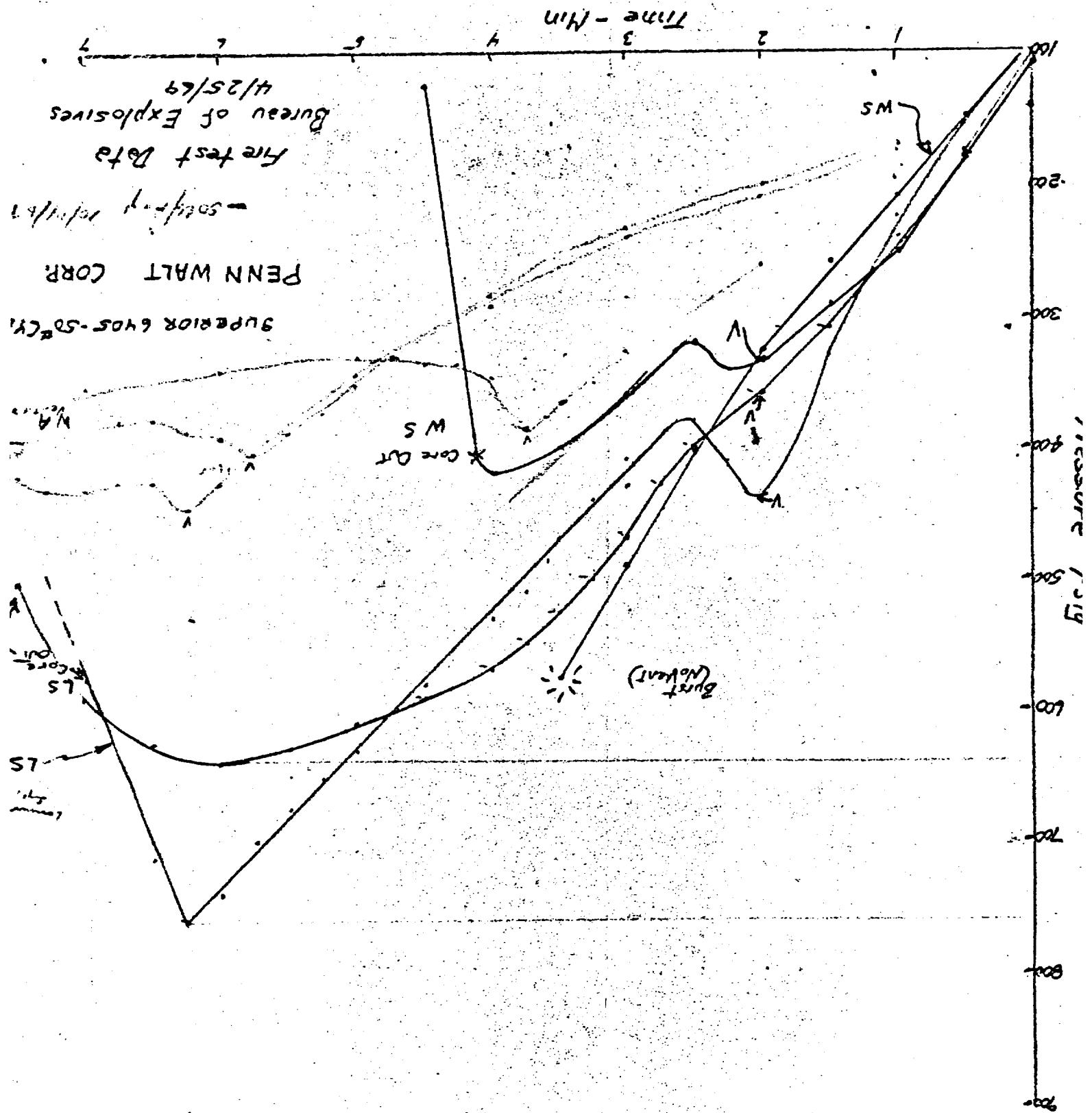
ADDED
APPROVAL NOTE DATE

DATE

DATE

DATE

DATE





TEST & INSPECTION REPORT

AKO, INC.

A OK TESTING DIVISION

P.O. BOX 929
HARTFORD, CONNECTICUT 06101

A OK BALANCING DIVISION

E S WHITE TIMING DEVICES DIVISION

PLANT LOCATION BROAD BROOK ROAD ENFIELD CONN 06082

COMPLETE TESTING AND INSPECTION SERVICE

MASS, FORCE, TORQUE, HYDROSTATIC FLOW, PHYSICAL, PROOF TESTING

MASS SPECTROMETRY LEAK DETECTION, STATIC & DYNAMIC BALANCING

SCALE & DYNAMOMETER, CALIBRATION, FLUORESCENT PENETRANT & NDT TESTING

CHARGE
TO
Pressure Pak, Inc.
25 Skinner St.
East Hampton, Conn.

SHIP
TO

LAB #	YOUR REFERENCE NO.	SHIPPED FROM	VIA	SHIPMENT COMP PART <input checked="" type="checkbox"/> <input type="checkbox"/>	DATE	INV. DATE
514	R. Jernberg	Enfield, Ct truck			9-27-79	

QUANTITY	PART NO.	DESCRIPTION	PARTS CONFORMING _____
1		Safety Relief Valve	PARTS NOT CONFORMING _____

METHOD USED:

Relief valve was flow tested @ 450 PSI inlet pressure using a standard sonic flow nozzle to measure flow rate.

RESULTS:

The flow rate was 25.3 SCFM.

(or 27 CFM @ 495 psia)

EQUIPMENT USED:

Flow Dyne .0251 nozzle

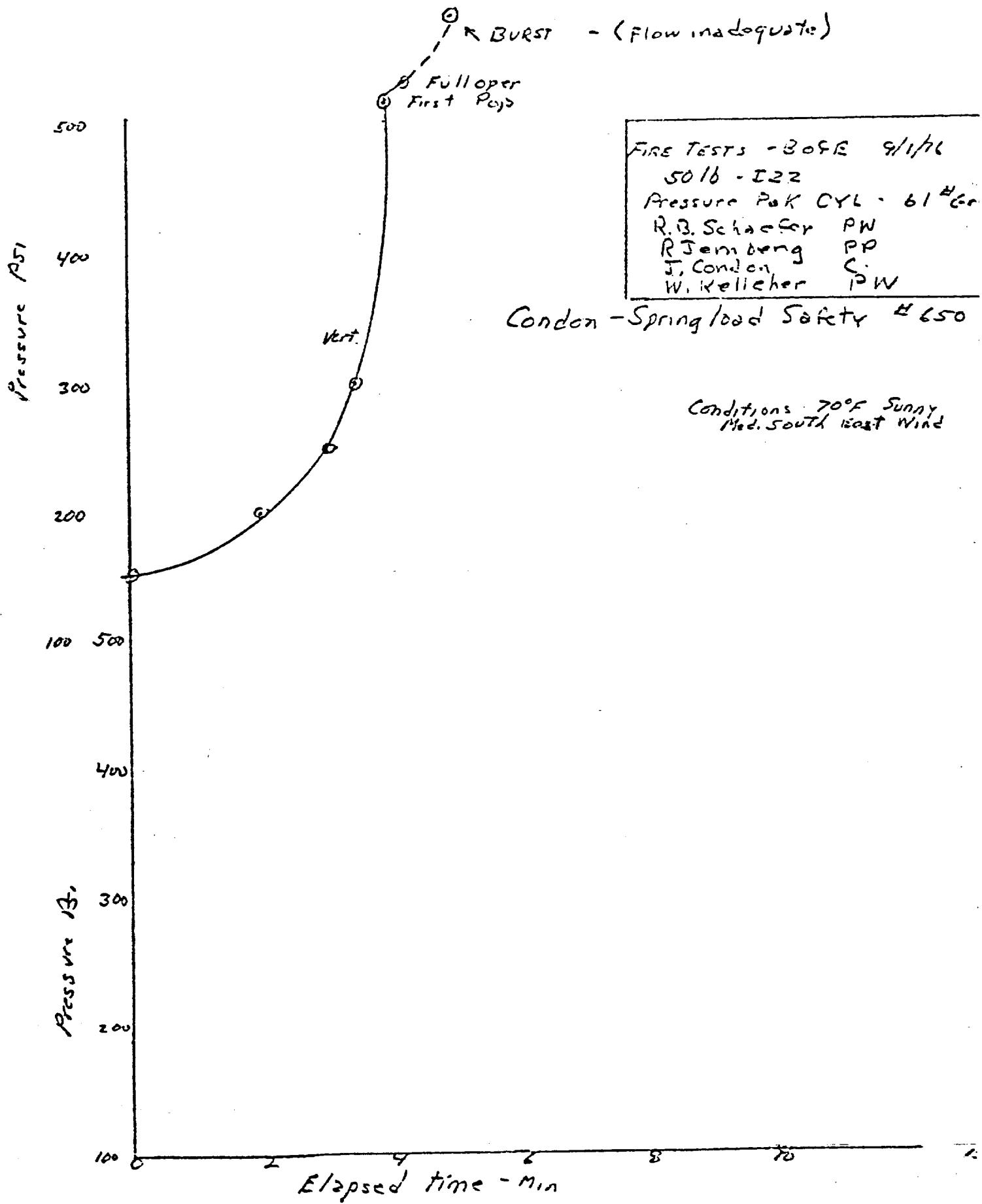
The above parts have been carefully tested in accordance with above methods. This inspection is limited to defects disclosed from above method only. OUR LIABILITY NOT TO EXCEED COST OF RE-INSPECTION OR RE-TEST.

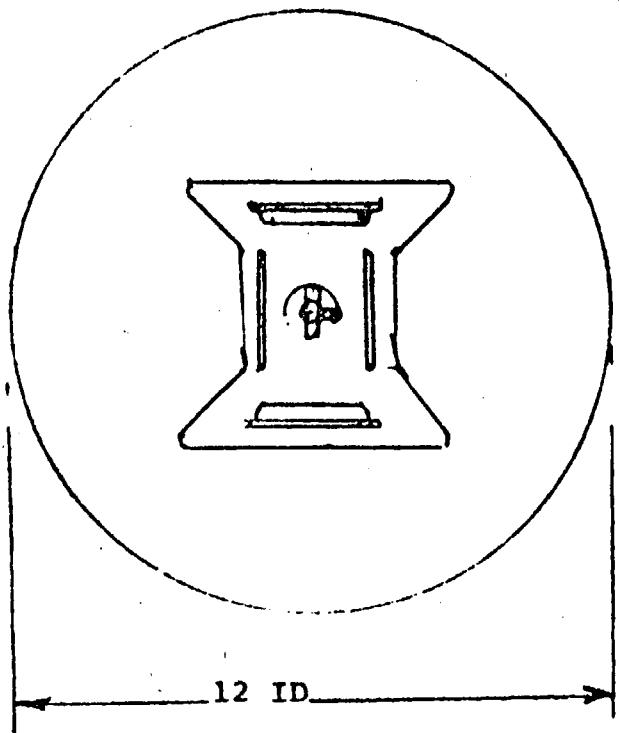
RESPECTFULLY SUBMITTED,

Certification No. 20403

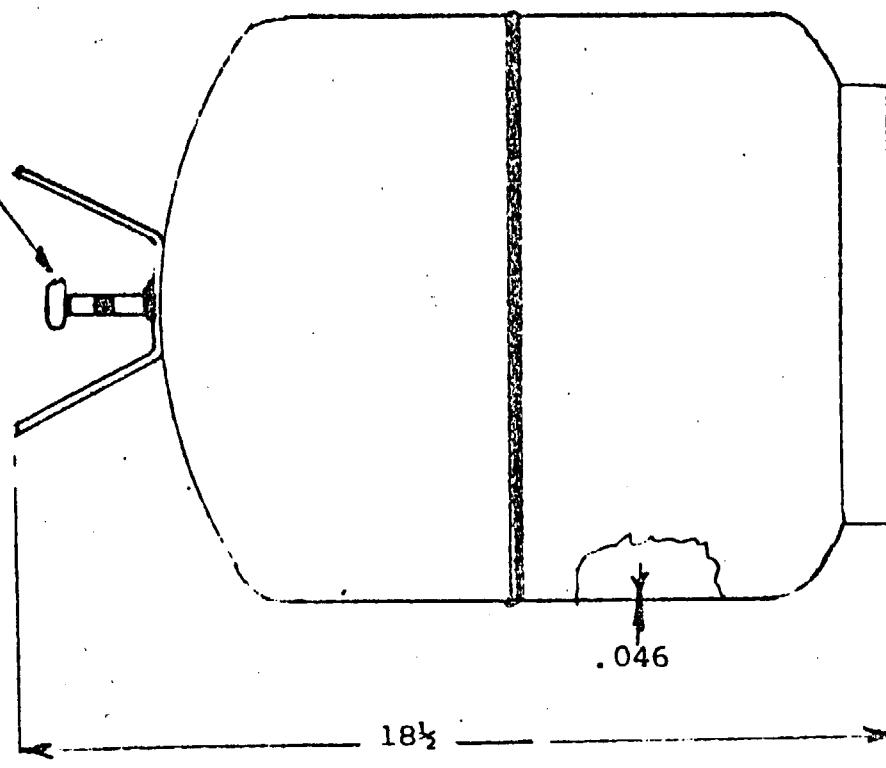
Subscribed and sworn to before me
this day of 19.....

(Seal)





650
CONDON 649 VALVE WITH 666 DISC



DOT39-NRC 260/325 M1002
 CAPACITY 53.25 LBS. WATER MIN.
 SERVICE PRESSURE 260 PSI
 TEST PRESSURE 325 PSI
 BURST PRESSURE 650 PSI MIN.
 FINISH: ONE COAT ENAMEL

PRESSURE-PAK CONTAINER, INC.
 East Hampton, CT 06424

DR.: RHS	SCALE $\frac{1}{4}$	DATE 9/21/71	PART #
			92371

TITLE:
 50 lb. W/C DISPOSABLE CYLINDER

MATERIAL:
 AB. KILLED AISI 1010 STEEL

1025-10000000000000000000000000000000

SUBJECT Bureau of Explosives Tests - Isotron 50-Lb.

DATE September 3, 1976

TO FILE

FROM R. B. Schaefer

IN REPLY TO

COPIES TO H45, M30, D10
Jim Condon, Condon Mfg. - Bob Jernberg, Pressure Pak

At the Bureau of Explosives in Raritan Industrial Park on September 1, a series of tests were made to see if we could qualify the Condon Steel Valve for flow and performance. The attached chart shows the results of the test which shows inadequate flow on the spring loaded version; but excellent performance on the diaphragm type. In view of our interests in having a secondary source on an adequate valve, we have asked Condon to continue to work on the spring load type but would like to get a trial lot of the diaphragm style for commercial experimental work.

Safety devices have not been a problem nor have they had bad experience in their testing rigs.

RBS/ms
Attach.



GAS
500 FIFTH AVENUE • NEW YORK, N.Y. 10110 • (212) 364-1130

FIRE TEST DATA IN SUPPORT
OF
S-1.1 FORMULAE

October 30, 1978
(Original)

November 13, 1978
(Revised)

December 11, 1978
(Revised)

November 1, 1980
(Revised)

LIST OF PHOTOGRAPHS

<u>Negative Number</u>	<u>Page Number</u>	<u>Description</u>
3	8	Eclipse Fire Engine Company, wheel type burner unit with fire brick cylinder support installed
4	8	Burner unit with secondary wind deflector installed
6	9	Spark Igniter being installed thru base assembly
8	9	Center chimney assembly installed
10	10	Top chimney section and downdraft deflector installed
11	10	Lower insulation, two flue gas and two cylinder surface T/C's, Spark Igniter and propane fuel line installed
12	11	Braided steel cable blast mats fully installed
13	11	Dummy 20 lb. CO ₂ cylinder before instrumentation check-out dry run
14	11	Dummy cylinder after dry run
15	12	Test assembly (rear right), propane fueling cylinder (right foreground), instrumentation van (left center)
16	12	4BA-240 Propane Fueling Cylinder with Brooks Flowmeter and Fisher LP Gas Regulator
17	13	Brown Potentiometer with calibration balance for automatic pressure readout; 0-6000 psi Helicoil Visual Readout Pressure Gage (0-2000 psi gage not shown) with 0-5000 psi Teledyne Pressure Transducer (0-1000 psi Transducer not shown) and attached pressure bleed-off valve
18	13	Minimite II Thermoelectric T/C Visual Readout Potentiometer with 4 channel switchover box
23	18	DOT 3AA, 2015 psig, Linde Type "S" Cylinder (N ₂) before start of Test-3
24	18	Cylinder after Test-3
138-7	25	Luxfer DOT E-6498 Aluminum Cylinder and Fire Test Apparatus Used by Luxfer (From previous tests)

A. INTRODUCTION

This document contains fire test data whose purpose is to support and validate the pressure relief device flow equations of CGA Pamphlet S-1.1 in the proposed revised 1978 version. These equations have been used successfully for over 30 years where properly applied.

The flow requirements computed from these equations are for compressed gases. Where the gas is liquefied then the computed flow must be doubled; i.e., liquefied gases must have double the flow capacity for a given cylinder water capacity.

In the past some fire tests have been run with undersize pressure relief devices. This was done knowingly in an effort to determine the maximum cylinder capacity for a specific pressure relief device. In these cases, maximum cylinder capacity was indicated by cylinder rupture. These types of tests are not to be confused with those tests designed to validate S-1.1 equations. The validation tests were performed with relief devices sized to the minimum allowed by S-1.1 equations for the cylinders and contained gases on which they are installed. The test data herein is for such applications.

Fire tests have been performed to date by the following methods:

1. Gasoline open pan
2. Bureau of Explosives, wood/kerosene bonfire
3. Chimney controlled gas

The chimney type test has been selected as the standard type fire test because it provides the greatest control over test performance and maximizes reproducibility of test conditions. While there are a number of factors that

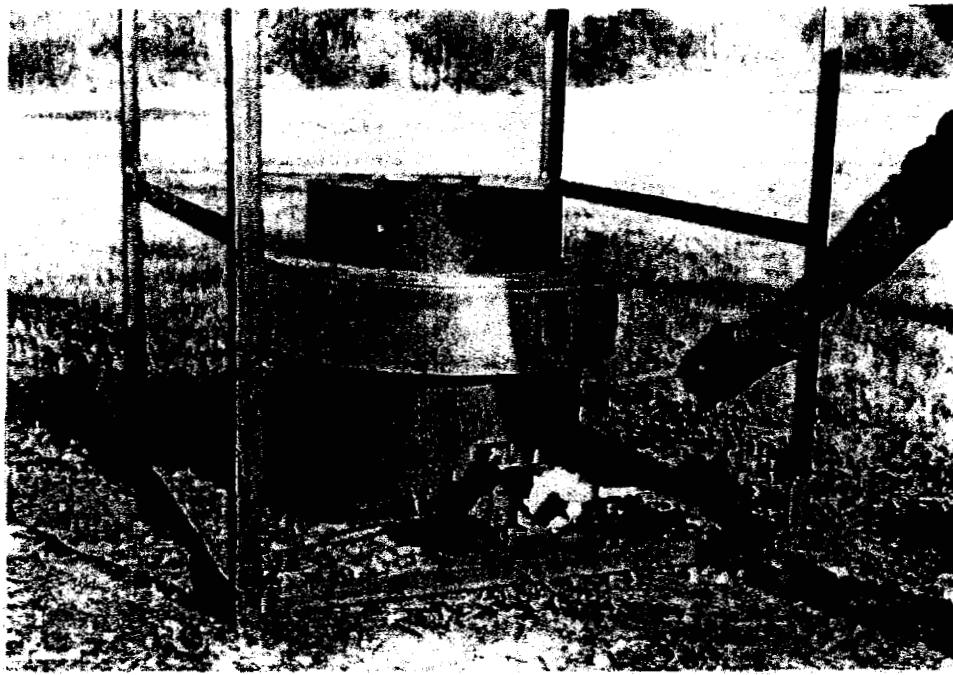
FIRE TESTS REQUIRED TO VALIDATE S-1.1 FORMULAE

TABLE 1

CASE	S-1.1 PARA. VALI- DATED	STATE OF GAS		PRESSURE			CONTAINER TYPE					REMARKS
		LIQ.	NON LIQ.	HIGH	LOW	4L	DOT 39 STL.	3A, 3AA	3E TYPE 4E	4B, 4BA		
*	1A	4.5		X	X		See Note (a)		X			Validated by Data Point 1
	1B	4.5		X	X				X			Validated by Data Point 2
2	4.5, 4.7					X						Not required; Temp. / Press. combination cannot exceed 2 times factor built into S-1.1 for liquefied gases
*	3A	4.6	X		X			X				Validated by Data Point 3
*	3B	4.6	X		X			X				Validated by Data Point 4
	4A	4.6, 4.8				X				X		Validated by Data Point 5 and 11
	4B	4.6, 4.8	X			X	X					Validated by Data Points 6, 7 and 8
*	4C	4.6, 4.8				X				X		Validated by Data Point 9
5	4.9	X			X	X						Cryogenic; Validated by Data Point 10

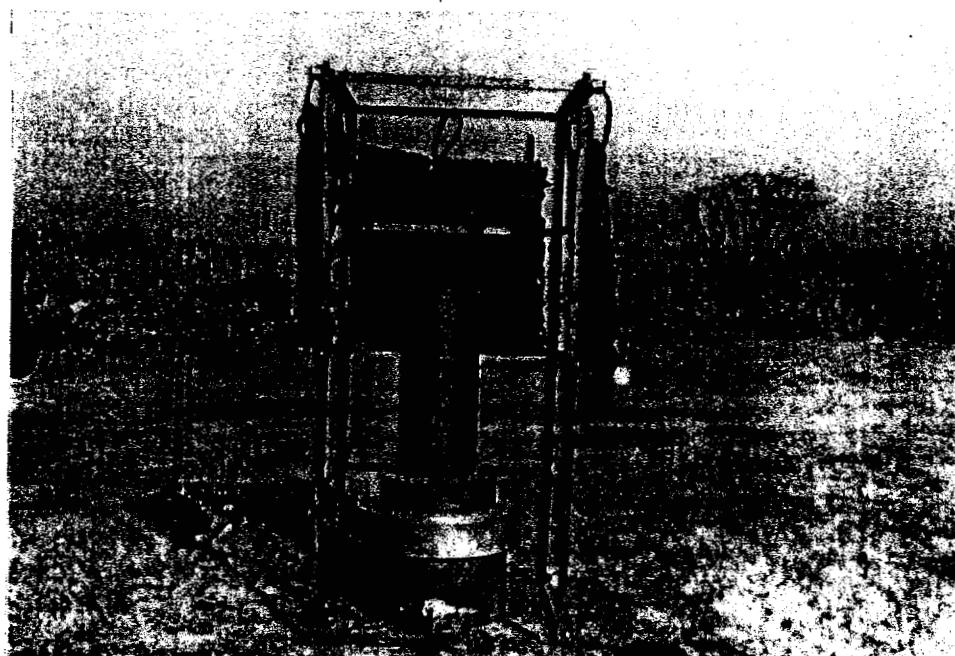
NOTES: (a) Not required because DOT 39 limited to size; always 2.5 times required flow provided because the maximum size of DOT 39 cylinders is 10 lbs. and the S-1.1 equations require provisions for a 25 lb. capacity.

* - Tests run at Bureau of Explosives on 10/11/78 and 10/12/78.



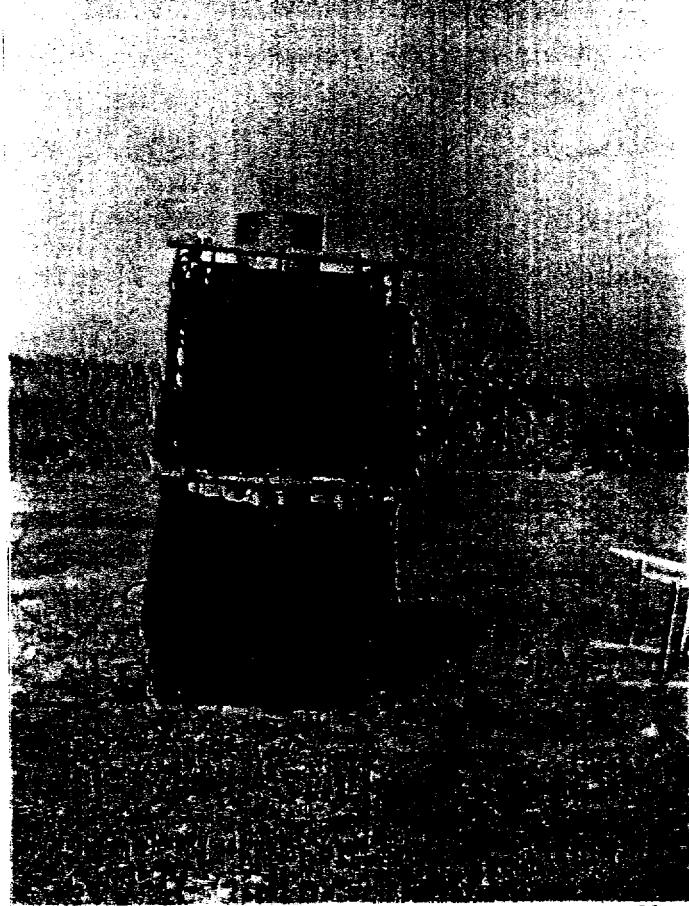
6

Spark Igniter being installed thru base assembly



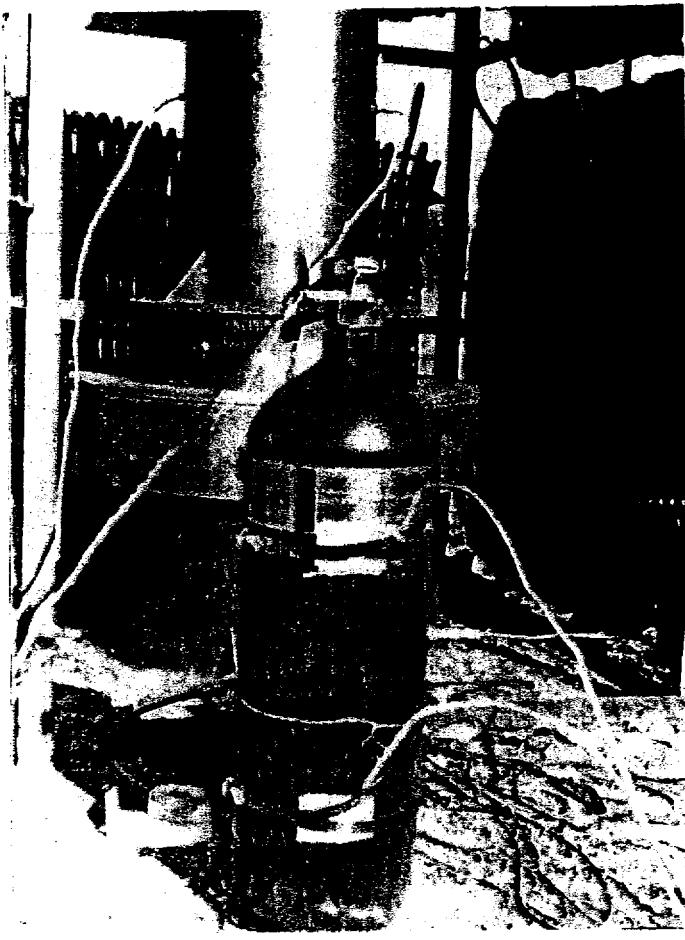
8

Center chimney assembly installed



12

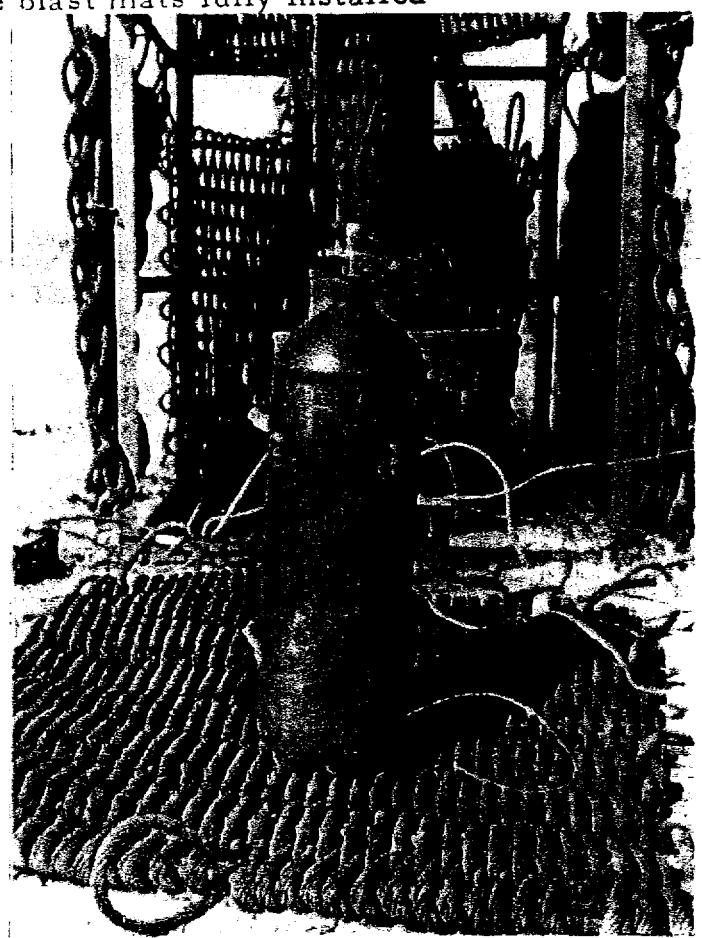
Braided steel cable blast mats fully installed



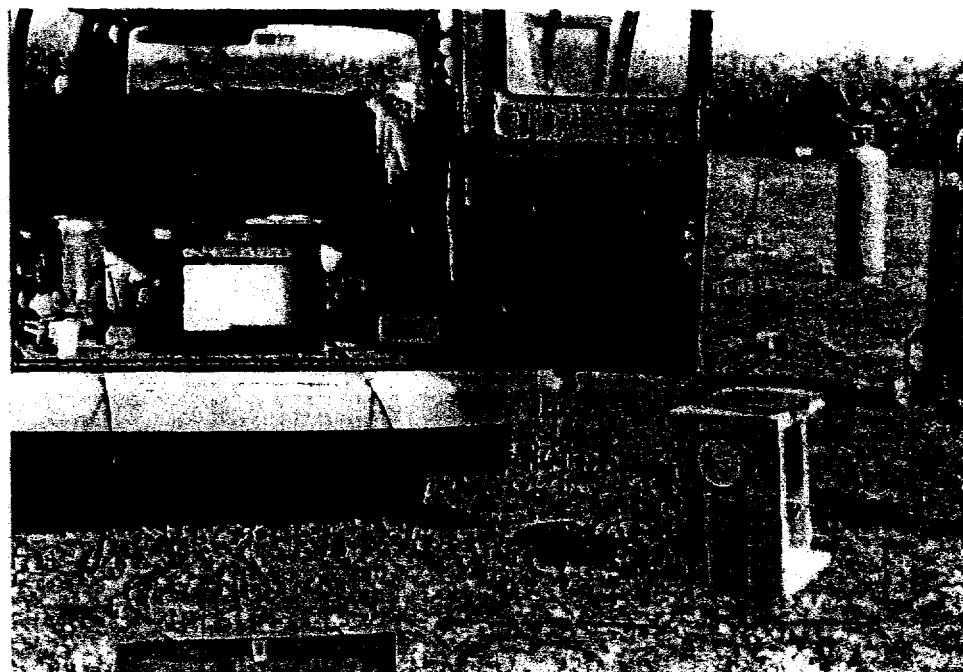
13

Dummy 20 lb. CO_2 cylinder before instrumentation
check-out dry run

14



Dummy cylinder after dry run



17

Brown Potentiometer with calibration balance for automatic pressure readout; 0-6000 psi Helicoil Visual Readout Pressure Gage (0-2000 psi gage not shown) with 0-5000 psi Teledyne Pressure Transducer (0-1000 psi Transducer not shown) and attached pressure bleed-off valve



18

Minimite II Thermoclectric T/C Visual Readout Potentiometer with 4 channel switchover box

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 1
NON-LIQUEFIED, HIGH PRESSURE GAS IN 3A
OR 3AA CYLINDER (CASE 1A OF TABLE 1)

FIRE TEST DATA , BUREAU OF EXPLOSIVES

CYLINDER PRESSURE, CYLINDER SURFACE AVERAGE TEMP, FLUE GAS AVERAGE TEMP VERSUS TIME AFTER START OF TEST

CYLINDER TYPE - DOT 3AA, 2015⁺ PSIG, LINDE TYPE "S"

CYLINDER CONTENTS - N₂, 2200 PSI @ 70°F

VALVE TYPE - CONDON 880, MEDICAL E VALVE

TEST RUN - 3 (CASE 1A) SOLID LINES
12 (CASE 1A) DASH LINES

AMBIENT TEMP. ~70°F, TEST 3
~45°F, TEST 12

WIND VELOCITY ~15 MPH, TEST 3
~10 MPH, TEST 12

DATE : 10/11/78 TEST 3
11/8/78 TEST 12

MAX. LOCAL -
SURFACE TEMP.

FLUE GAS TEMP.)

510°F TEST 3
580°F TEST 12

1380°F TEST 3
1060°F TEST 12

DISC BURST
2650 PSI
(Nom. DESIGN
BURST PRESSURE
3700 PSI)

2500

2000

1500

1000

500

1

2

3

4

5

6

7

NOTE! APPARENT LOSS
OF FLAME AFTER
DISC BURST IN
TEST 3 HAS NO
EFFECT ON RATE
OF PRESSURE LOSS

Amst Kalskin
Superior Valve Co.

CYLINDER PRESSURE

FLUE
GAS
TEMP.)

CYLINDER SURFACE TEMP.)

TEMP
(°F)

1800

1600

1400

1200

1000

800

600

400

200

FIRE TEST DATA, BUREAU OF EXPLOSIVES

14

CYLINDER PRESSURE, CYLINDER SURFACE AVERAGE TEMP.,
FLUE GAS AVERAGE TEMP VERSUS TIME AFTER START
OF TEST

CYLINDER TYPE - DOT 3AA, 2016+ PSIG, LINDE TYPE "S"

CYLINDER CONTENTS - N₂, 2200 PSI @ 70°F

VALVE TYPE - CONDON 880, MEDICAL E VALVE, Dwg 880-A

TEST RUN - 6 (CASE 1A), VERTICAL

AMBIENT TEMP. ~ 75°F

Wind Velocity ~ 10 MPH

DATE - 10/12/78

TEM
(°F)

1800

1600

1400

1200

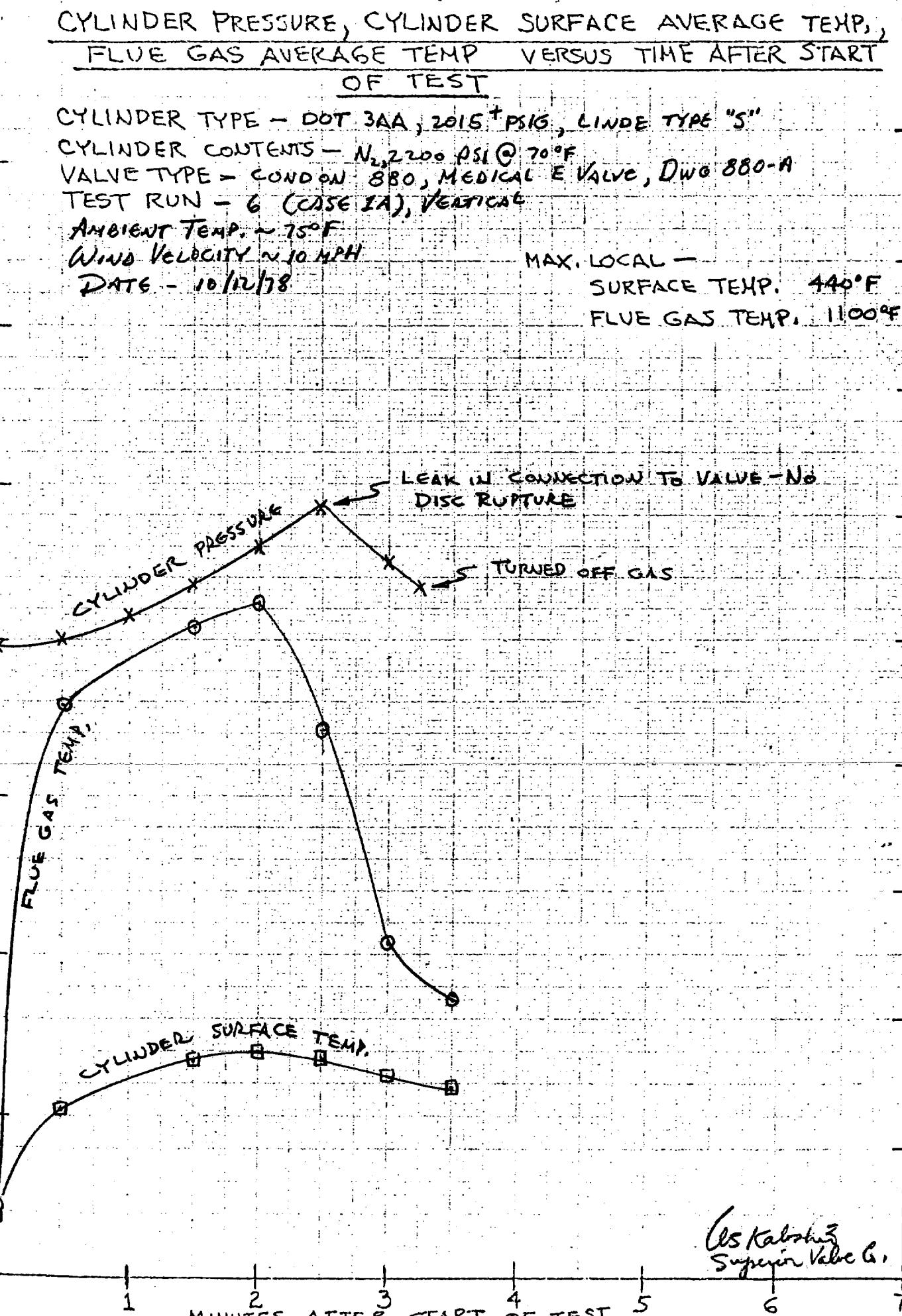
1000

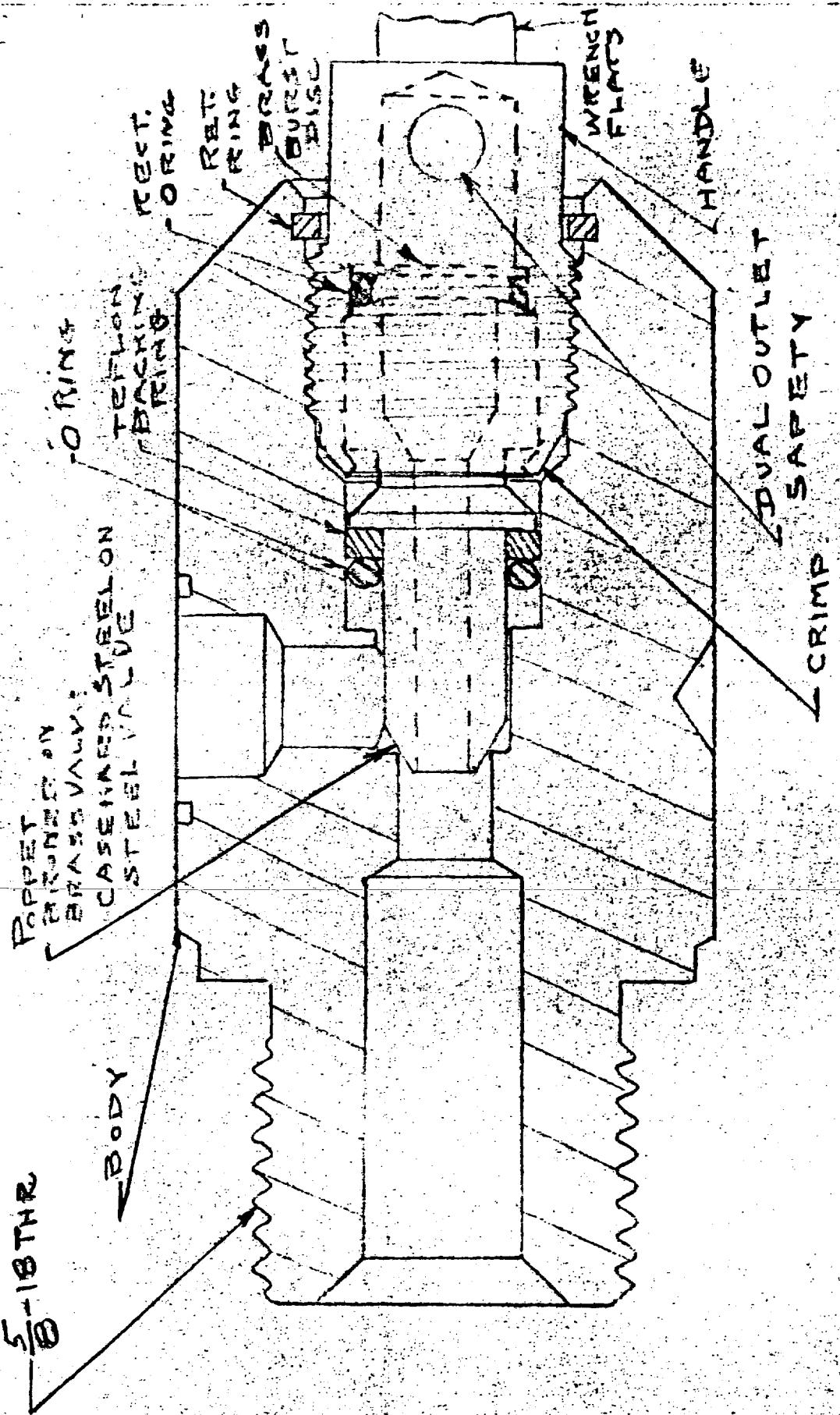
800

600

400

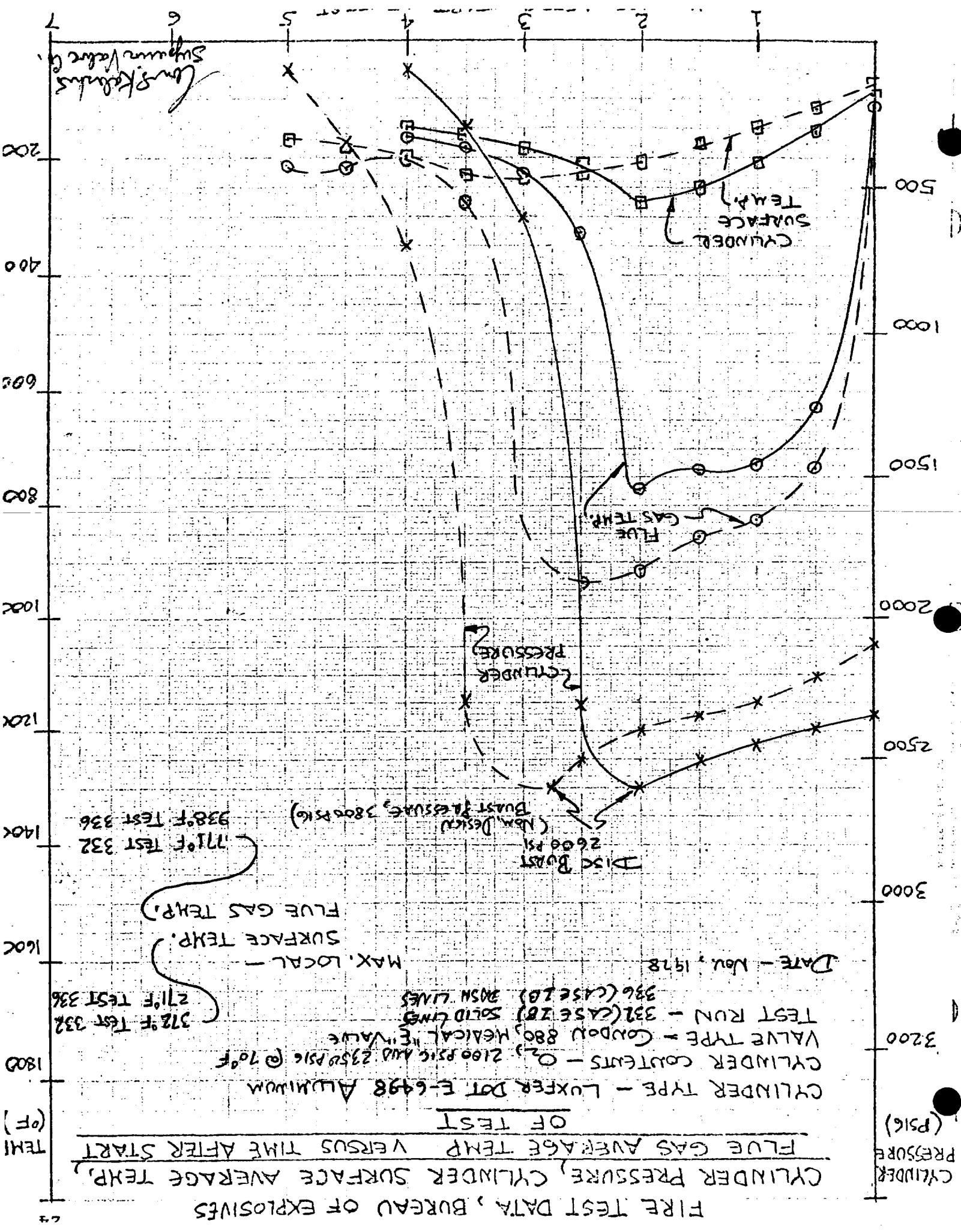
200

(as Kalsburg
Supervin Valve Co.)



PRESSURE PAX INC.	
CHARTONSONN	
SAL-E 880 SAFETY	DATE 2/5/22
MAT BRAZED STEEL	
MEA. E. VALVE 71877	

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 2
NON-LIQUEFIED, HIGH PRESSURE GAS IN 3E TYPE
CYLINDER (CASE 1B OF TABLE 1)



BONFIRE TEST STACKTEST NO. 332 CYLINDER TYPE NISO SERIAL NO. CC 7946 DATE 11/8/78

PROPANE BURNER-MIN ORIFICE PRESSURE PAK VALUE #71877

Elapsed Time	Pressure psi	TEMPERATURE °F	REMARKS
	Stack Valve	Cyl. Center Cyl. Bottom	
0:0	2350	110 86 91	95'
0:30	2400	628 98	120 190
1:00	2450	729 108	138 274
1:30	2500	738 118	158 336
2:00	2600	771 130	177 372
2:30	2300	331 120	167 271
3:00	600	228 107	155 216
3:30	300	182 108	142 180
4:00	100	167 111	136 167 V - 2'
4:30			
5:00			
5:30			
6:00			
6:30			
7:00			
7:30			
8:00			Lading 2850psi O ₂
8:30			
9:00		X SR Safety Relief	
9:30		X V Vent Term	
10:00			

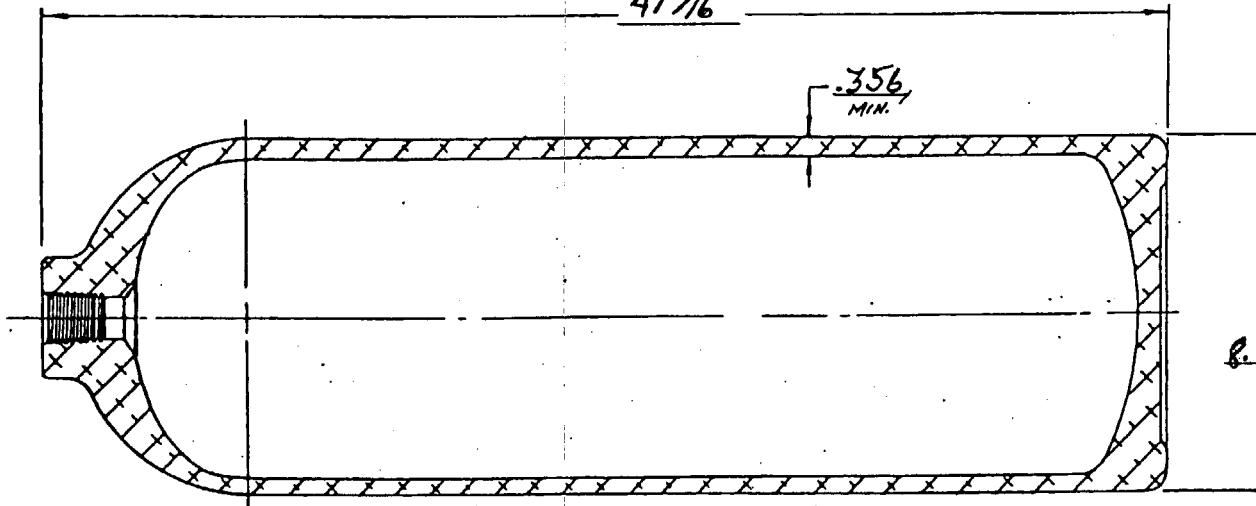
BONFIRE TEST DATA

EST NO. 336 CYLINDER TYPE N150 SERIAL NO. SD176 DATE 11/9/78

PROPANE BURNER- MIN ORIFICE Pressure PAK VALVE #71899

Elapsed Time	Pressure psi	TEMPERATURE OF			REMARKS
		Valve	Cyl. Center	Cyl. Bottom	
0:0	2100	118	68	76	79
0:30	2200	734	104	104	129
1:00	2300	824	118	135'	165'
1:30	2350	855'	132	140	201
2:00	2400	914	158	162	251
2:30	2500	938	171	176	271
2:44 3:00	2600	-	-	-	-
3:30	2300	276	121	202	255'
4:00	700	202	107	181	222
4:30	350	222	107	164	200
5:00	100	210	109	150	187
5:30					
6:00					
6:30					
7:00					
7:30					
8:00					loading 2100psi O2
8:30					
9:00					
9:30		*	SR Safety Relief		
10:00		#	Vent Tim		

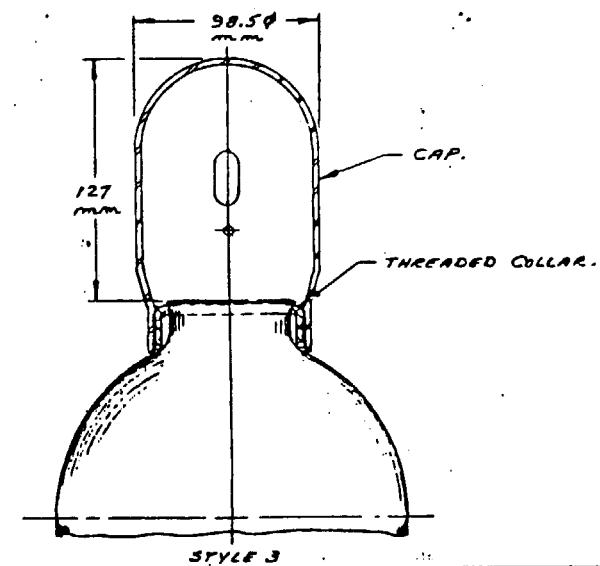
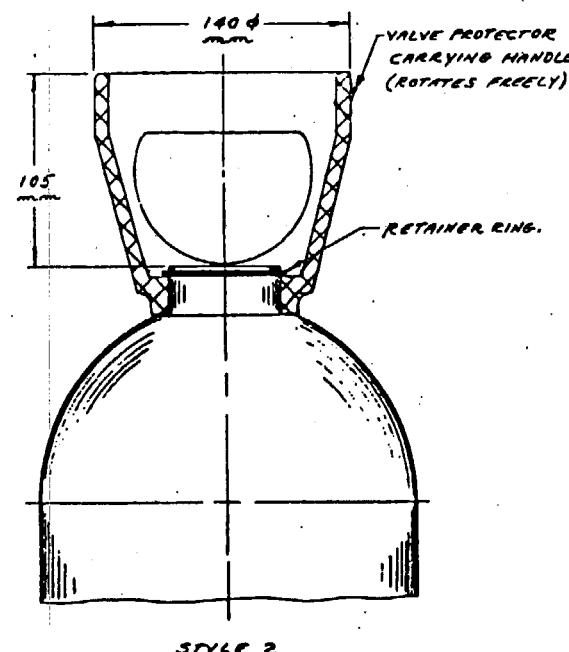
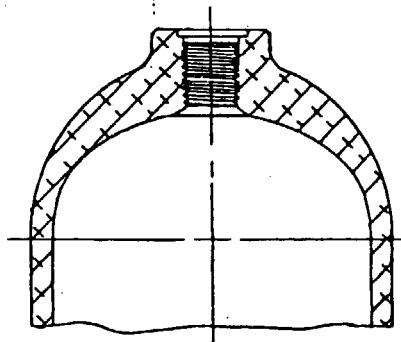
47 15/16



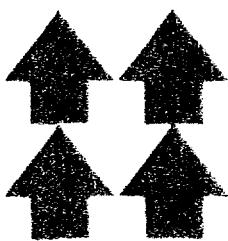
NOTES:

1. Cylinder to meet DOT Permit 6498
2. Capacity:
150 cu.ft. at 2015 psi
water vol.=
1800 cu.in. min.
3. Test Pressure
3360 psig
4. Service Pressure
2015 psi

THREAD 1.125-12 UNF



ITEM	DIAM.	DESCRIPTION	
 LUXFER USA LIMITED RIVERSIDE, CALIFORNIA			
SCALE	LIMITS ON DIM. UNLESS OTHERWISE SPECIFIED	SMOOTH ALL SHARP EDGES UNLESS NOTED	PER ASSEM.
DATE	ANGULAR ± 1°	ANGLE 90°	PER ASSEM.
DRAWN BY	FRACTIONAL ± 1/16	DECIMAL ± .005 OR MM	FINAL ASSEMBLY NAME & NO.
APPROVED	USED FOR THIS PART OR SUB-ASSEMBLY NAME & NUMBER FOR COMPRESSED GAS		
REF.	NAME	NUMBER	REV.
	ALUMINUM CYLINDER	C-N150-7C	
	SHEET OF		
	CHANGE	BY	DATE



Luxfer USA Limited

1995 Third Street, Riverside, California 92507
Mail: P.O. Box 5300 — 92517
Telephone 714-684-5110 TWX 910-332-1755

November 14, 1978

Mr. Bill Kalaskie
Superior Valve Company
2200 North Main Street
Washington, PA 15301

Dear Bill:

Enclosed please find the following:

1. Bonfire Test Data Sheets - Tests 331, 332, 335, 336
2. Propane Burner Sketch
3. Pressure Pak Valve Drawing
4. Blueprints C50 and N150
5. Photograph of Propane Burner and Cylinder From Previous Test.

Bob Jernberg says you should have a drawing and test report of his valve used on the Linde cylinder. The flow report should be 9.75 cfm.

For your time temperature curves you will have to use Test Numbers 335 and 336, as we did not record any data on the other two tests after the safety functioned.

As added information we ran an experimental fusible safety with a flow rating of 6.7 cfm in a wood bonfire and it safely vented 2000 psi of N₂ in an N150 cylinder in 2 minutes.

Let me know if there is anything missing.

Sincerely,

G. H. Waite,
Project Manager

GHW:td

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 3
LIQUEFIED, HIGH PRESSURE GAS IN 3A OR 3AA
CYLINDER (CASE 3A)

FIRE TEST DATA, BUREAU OF EXPLOSIVES

CYLINDER PRESSURE, CYLINDER SURFACE AVERAGE TEMP.,
FLUE GAS AVERAGE TEMP VERSUS TIME AFTER START
OF TEST

CYLINDER TYPE - DOT 3AA-1800

CYLINDER CONTENTS - 20 LBS CO₂ @ 68% FILL DENSITY

VALVE TYPE - SUPERIOR VALVE, MODEL 1101-A70A WITH MODIFIED SAFETY

TEST RUN - I (CASE 3A-3), VERTICAL

AMBIENT TEMP. ~70°F

WIND VELOCITY ~15 MPH

DATE - 10/11/78

MAX. LOCAL -

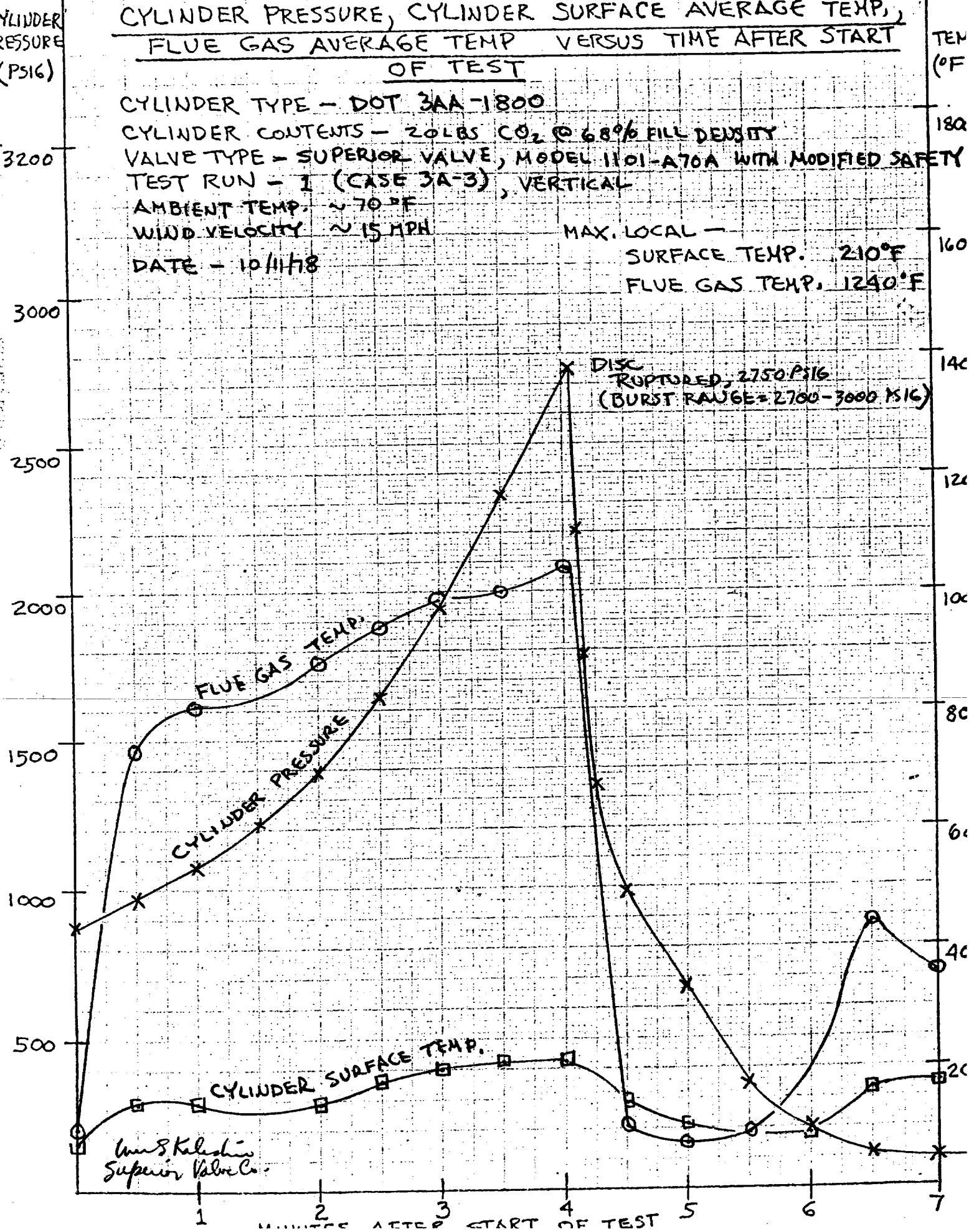
SURFACE TEMP. 210°F

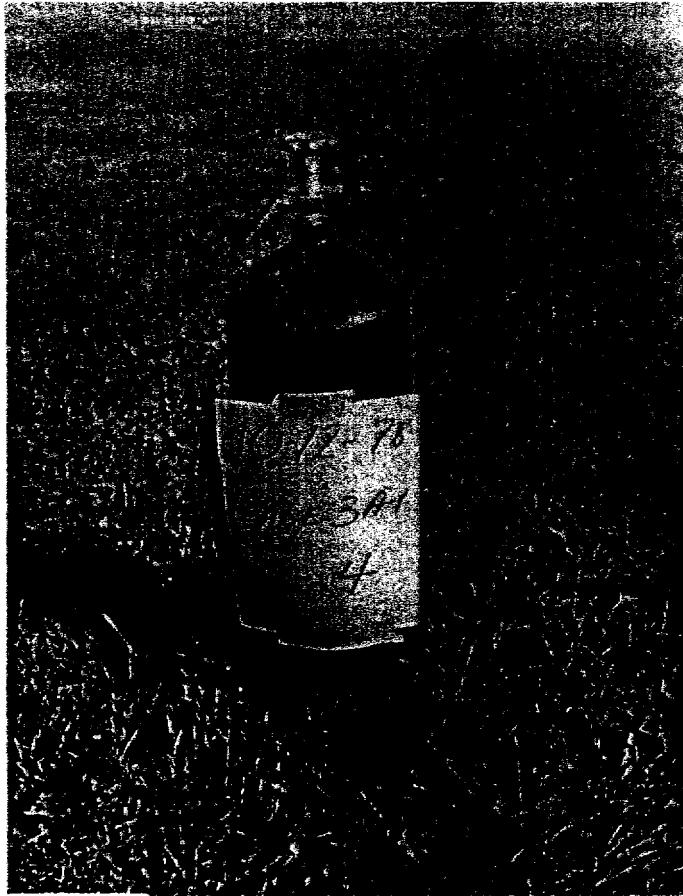
FLUE GAS TEMP. 1240°F

X DISC

RUPTURED, 2750 PSIG

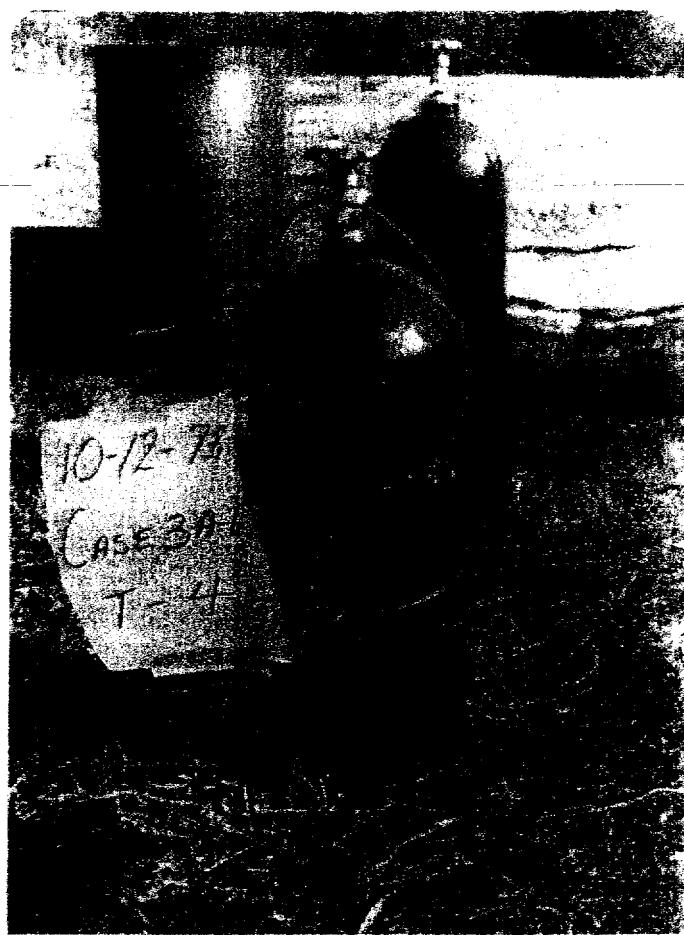
(BURST RANGE = 2700 - 3000 PSIG)





25

DOT 3AA, 1800 Kidde Cylinder (CO_2) before start
of Test-4



26

Cylinder after Test-4

Walter Kidde & Company, Inc.
Belleville Aerospace and Commercial Operations
Belleville, New Jersey, 07109, U.S.A.

COMPRESSED GAS ASSOCIATION
DOCKET 77-12

FIRE TEST PROGRAM ON
COMPRESSED GAS CYLINDERS AND
PRESSURE RELIEF DEVICES
FOR VALIDATION OF FORMULAS
IN CGA PAMPHLET S-1.1

CASE NO. 3A

Date September 29, 1978

By:

Charles F. Willms
Charles F. Willms, P.E.
Sr. Project Manager
Fire Protection Systems

CALCULATIONS

1. Water Capacity of Cylinder (Wc)

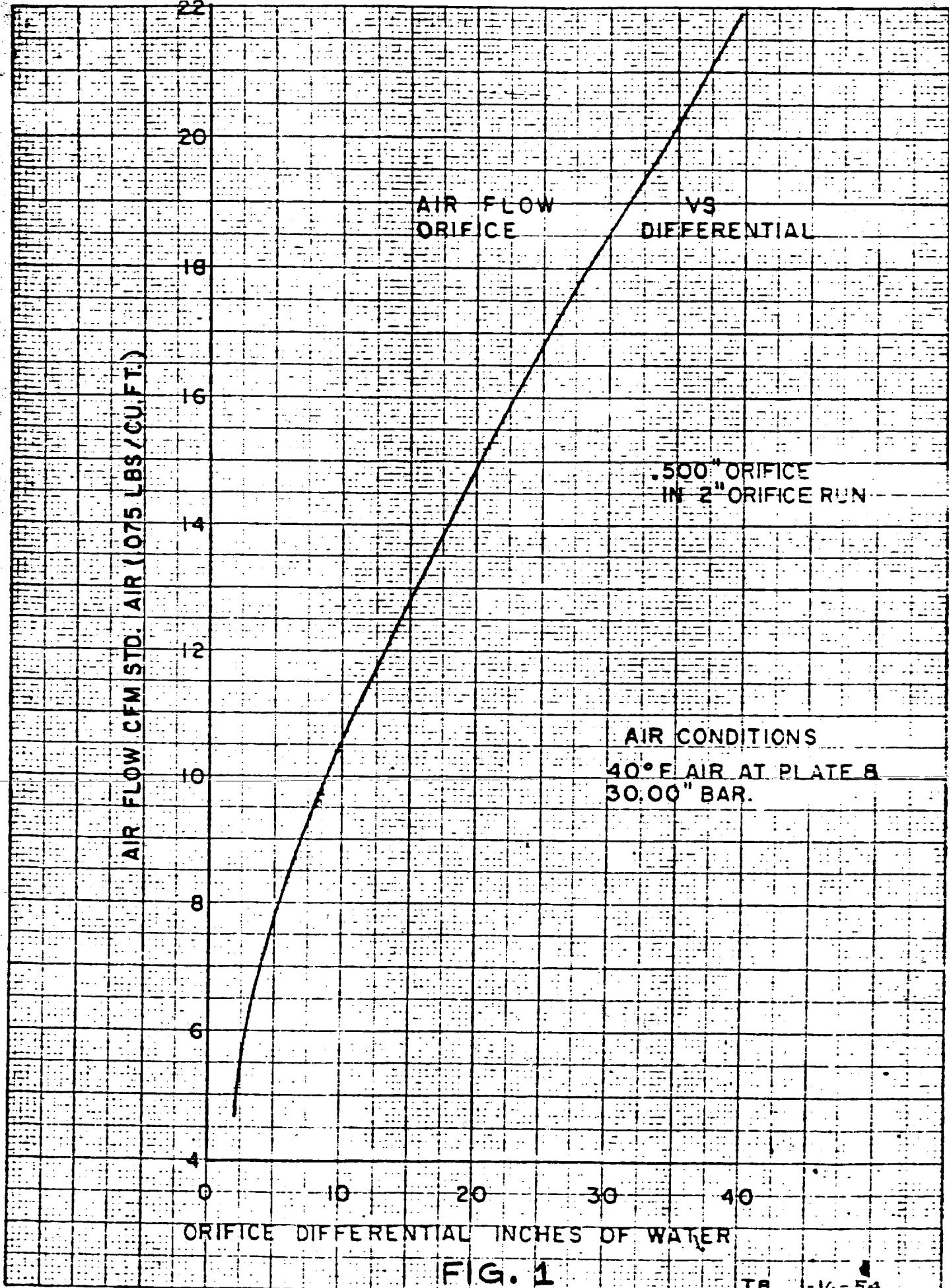
$$Wc = 825 \text{ in}^3 \times \frac{1 \text{ Gal. H}_2\text{O}}{231 \text{ in}^3} \times \frac{8.328 \text{ lb.}}{\text{Gal. H}_2\text{O}} = 29.74 \text{ lb. Water}$$

2. Pressure Relief Flow Area (Ref. S-1.1, par. 4.5; 4.6)

$$A = 2 (0.00012) Wc = 0.00024 (29.74) = 0.0071 \text{ sq. in.}$$

3. Minimum Required Flow Capacity of Pressure Relief Device
(Ref. S-1.1, par. 4.5; 4.6)

$$\begin{aligned} Qa &= 2 (0.154) Wc \\ &= 0.308 (29.74) \\ &= 9.16 \text{ SCFM Air} \end{aligned}$$



DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 4
LIQUEFIED, HIGH PRESSURE GAS IN 3E TYPE
CYLINDER (CASE 3B)

CYLINDER PRESSURE, CYLINDER SURFACE AVERAGE TEMP.,
FLUE GAS AVERAGE TEMP VERSUS TIME AFTER START
OF TEST

CYLINDER
PRESSURE
(PSIG)TEMP
(°F)

3200

180

3000

160

2500

140

2000

120

1500

100

1000

80

500

60

Am & Kalashin
Superior Valve Co.

CYLINDER TYPE - DOT E7042 ALUMINUM

CYLINDER CONTENTS - 20 LBS CO₂ @ 68% FILL DENSITY

VALVE TYPE - SUPERIOR VALVE MODEL 1100X81-A70A WITH MODIFIED SAFETY

TEST RUN - 2 (CASE 3B-1), VERTICAL

AMBIENT TEMP - ~70°F

WIND VELOCITY - ~15 MPH

DATE - 10/11/78

MAX. LOCAL -

SURFACE TEMP. 360°F

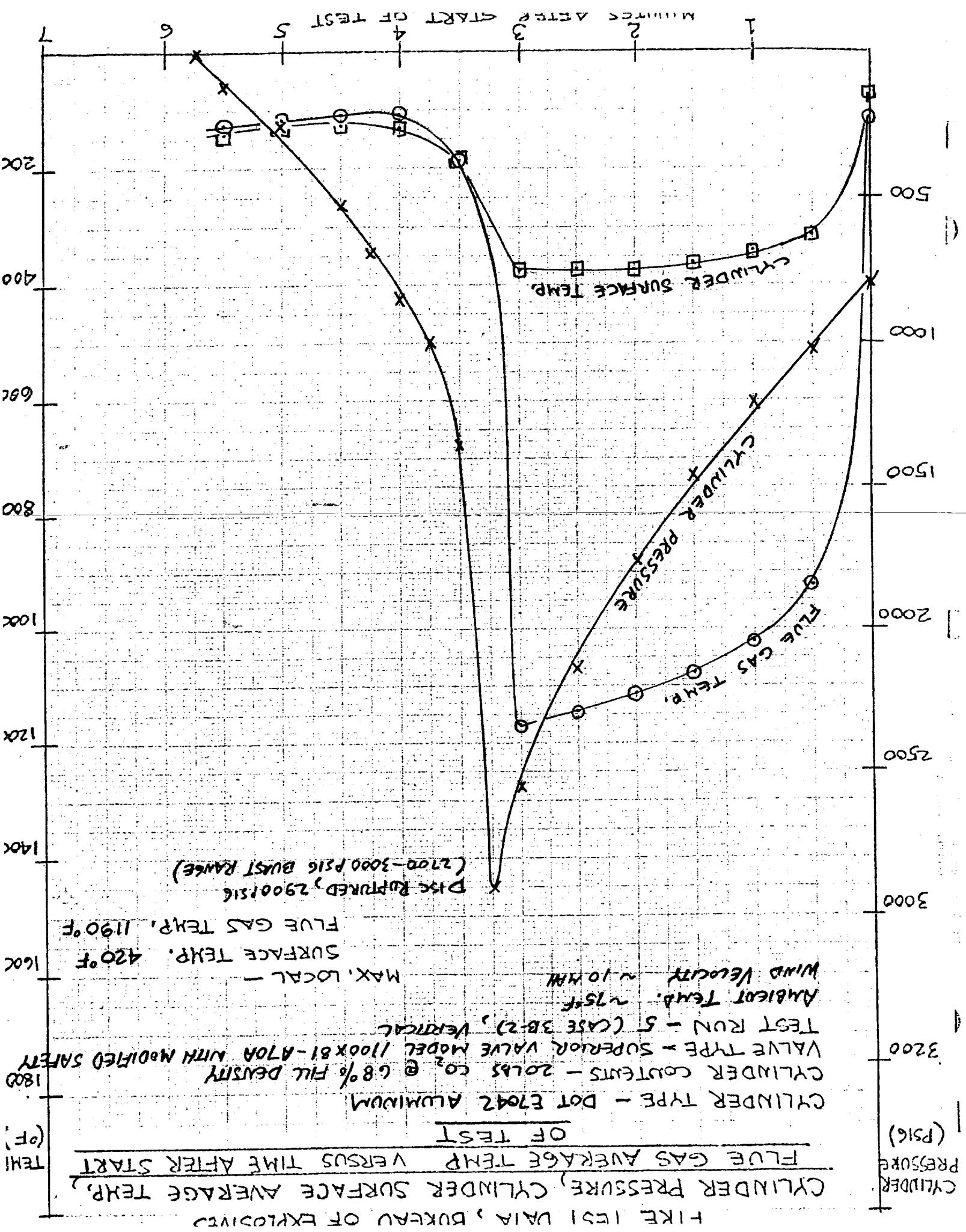
FLUE GAS TEMP. 1240°F

DISC RUPTURED, 2675 PSIG
(2700-3000 PSIG BURST RANGE)

FLUE GAS TEMP.
CYLINDER PRESSURE
CYLINDER SURFACE TEMP.

APPROX. 100 PSIG
ERROR IN CALIBRATION
@ ZERO POINT

MINUTES AFTER START OF TEST





Walter Kidde & Company, Inc.
Belleville Aerospace and Commercial Operations
Belleville, New Jersey, 07109, U.S.A.

COMPRESSED GAS ASSOCIATION
DOCKET 77-12

FIRE TEST PROGRAM ON
COMPRESSED GAS CYLINDERS AND
PRESSURE RELIEF DEVICES
FOR VALIDATION OF FORMULAS
IN CGA PAMPHLET S-1.1

CASE NO. 3B

Date September 29, 1978

By:

Charles F. Willms
Charles F. Willms, P.E.
Sr. Project Manager
Fire Protection Systems

CALCULATIONS

1. Water Capacity of Cylinder (Wc)

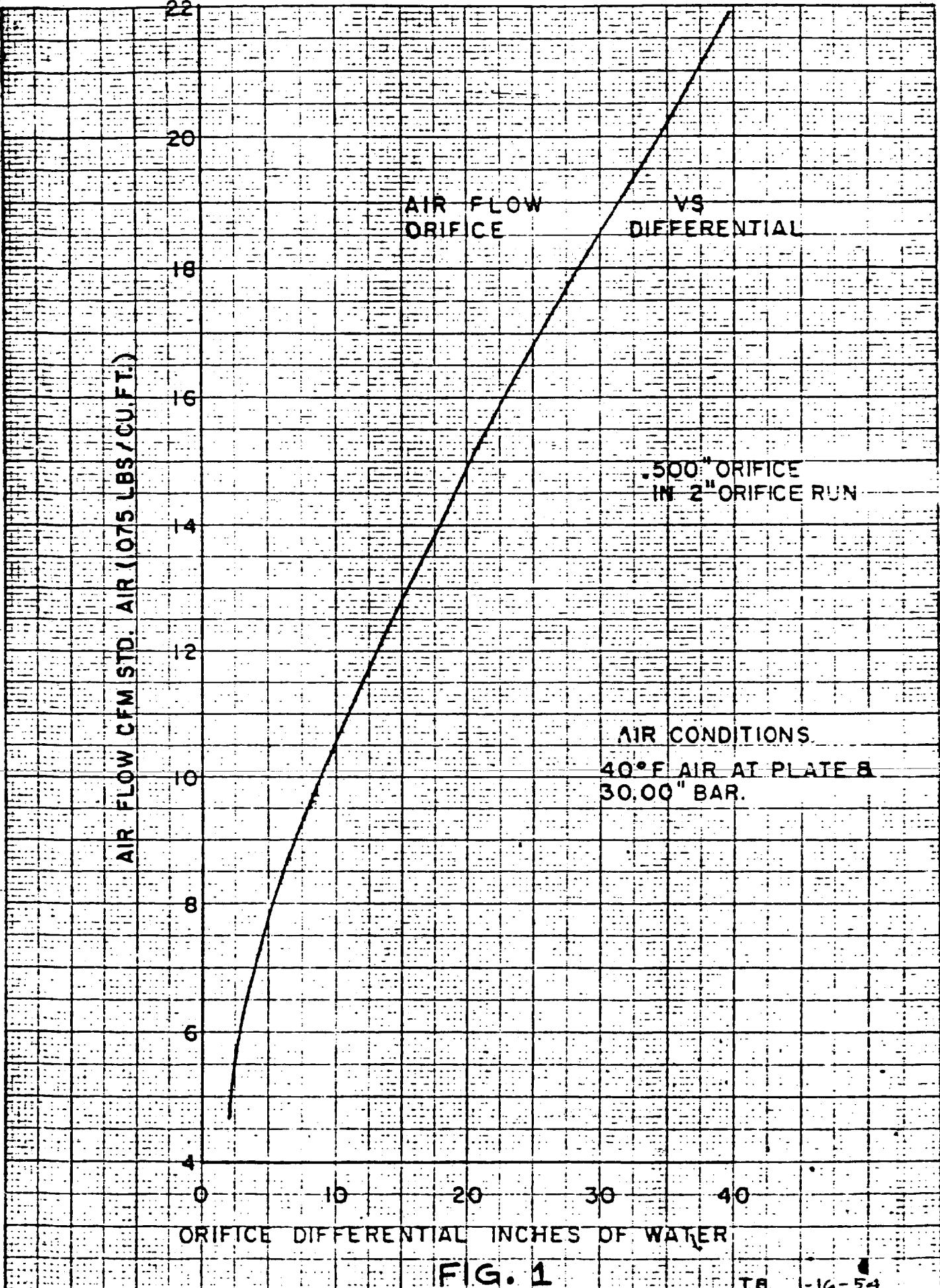
$$W_c = 825 \text{ in}^3 \times \frac{1 \text{ Gal. H}_2\text{O}}{231 \text{ in}^3} \times \frac{8.328 \text{ lb.}}{\text{Gal. H}_2\text{O}} = 29.74 \text{ lb. Water}$$

2. Pressure Relief Flow Area (Ref. S-1.1, par. 4.5; 4.6)

$$A = 2 (0.00012) W_c = 0.00024 (29.74) = 0.0071 \text{ sq. in.}$$

3. Minimum Required Flow Capacity of Pressure Relief Device
(Ref. S-1.1, par. 4.5; 4.6)

$$\begin{aligned} Q_a &= 2 (0.154) W_c \\ &\approx 0.308 (29.74) \\ &= 9.16 \text{ SCFM Air} \end{aligned}$$



THIS CATALOG NUMBER, 1100X81-A70A, CONSISTS OF AN 1100X15-A70A VALVE SHIPPED WITH A P1100X15-20W-90 "O"-RING AND INSTRUCTION SHEET BL-X118 (ONE INSTRUCTION SHEET PER CARTON). THE "O"-RING SIZE IS 216 (1.109" I.D. X .139" DIA. SECTION) IT IS IDENTIFIED BY A SINGLE WHITE DOT AND PACKAGED IN A PLASTIC BAG. EACH CARTON OF VALVES WILL INCLUDE ONE BAG OF "O"-RINGS, THE QUANTITY OF WHICH IS DETERMINED BY THE NUMBER OF VALVES IN THE CARTON.

TOLERANCE FOR DIMENSIONS OTHER THAN THOSE SPECIFIED	SUPERIOR VALVE COMPANY		DRAWN BY HOLLIS	DATE 4-22-77	DRAWING NO. 1100X81S
	DIA.	LENGTH			
± .002	± .005	BRASS CO ₂ PRESSURE SEAL CYL. VALVE	CH'KD. BY HILLIS	SCALE 1/4"	PART NO. OR CATALOG NO. 1100X81-A70A
± .003	± .010	FOR ALUMINUM CYLINDERS WITH 1 1/8"-12 UNF-2A CYLINDER THREAD			
REVISIONS					
DATE	DATE	DATE	DATE	DATE	DATE

CYLINDER
PRESSURE (PSIG)

FIRE TEST DATA

CYLINDER PRESSURE, CYLINDER SURFACE TEMP., VS TIME AFTER START OF TEST
(°F)

FLUE GAS AVERAGE TEMP.: 1189°F TEST 335

CYLINDER TYPE - Luxfer DOT #6498 Aluminum

CYLINDER CONTENTS - gaseous CO₂

VALVE TYPE - Condor 880 "Digital" Valve

TEST RUN - 335 (CAST 33) 205P & 100S

TEST WIND - 335 (CAST 33) 50-40 LINES, 335 (CAST 33) 205P & 100S

TEST WIND VELOCITY - N/A

TEST DATE - Nov. 1, 1978

Ambient TEMP - N/A

WIND VELOCITY - N/A

TEST PRESSURE - 2600 PSIG

DISC BREAK

(Now Disc Break) MAX LOCAL SURFACE TEMP { 335°F TEST 335

TEST 335

SURFACE TEMP { 194°F TEST 335

TEST 335

FLUE GAS TEMP { 1034°F TEST 335

TEST 335

FLUE GAS TEMP { 1189°F TEST 335

TEST 335

FLUE GAS TEMP { 1189°F TEST 335

TEST 335

FLUE GAS TEMP { 1189°F TEST 335

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TEST 335

FLUE GAS TEMP { 1189°F TEST 335

TEST 335

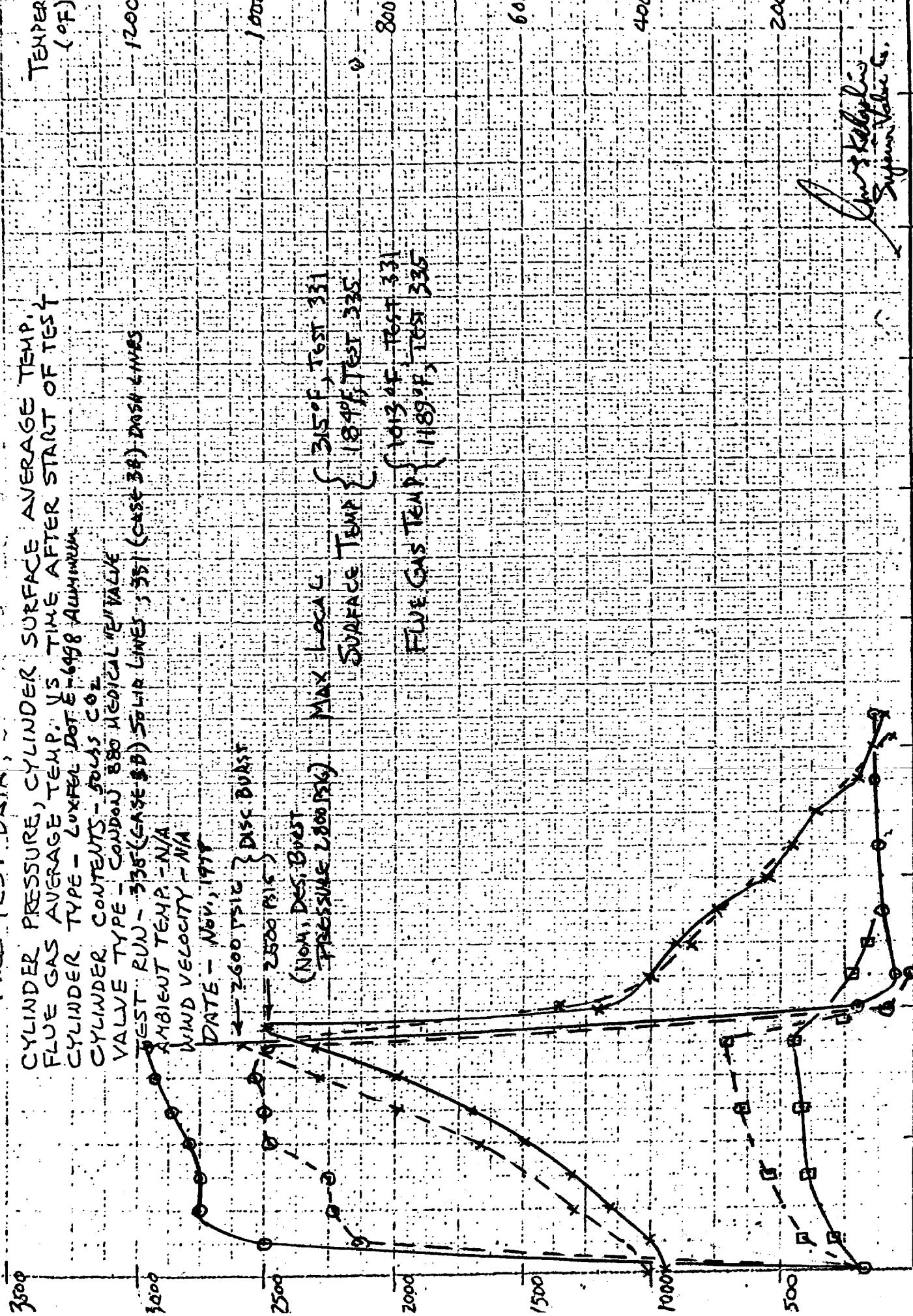


Chart kindly supplied by
Superior Valve Co.

BONFIRE TEST DATA

TEST NO. 335 CYLINDER TYPE C50 SERIAL NO. SD181 DATE 11/9/78

PROPANE BURNER - MIN ORIFICE PRESSURE PAK VALUE " 71877

Elapsed Time	Pressure psi	TEMPERATURE OF			REMARKS
		STICK Valve	Cyl. Center	Cyl. Bottom	
0:0	950	66	64	67	
0:30	1000	1004	82	115	
1:00	1150	1105	96	130	
1:30	1300	1099	111	145	
2:00	1500	1117	126	155	
2:30	1700	1144	143	164	
3:00	2000	1171	158	173	
3:30	2300	1189	175	183	* SR
4:00	2500	-	-	-	
4:30	1200	83	101	112	
5:00	1000	27	83	81	
5:30	900	35	73	63	
6:00	750	41	62	58	
6:30	550	44	53	56	
7:00	450	47	46	54	
7:30	350	51	42	53	
8:00	200	52	41	51	
8:30	150	55	40	50	
9:00	100	55	40	49	** V - 4' 45"
9:30					hadning 50lb CO ₂
10:00					* SR Safety Relief ** Vent Tim

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 5
LIQUEFIED, LOW PRESSURE GAS IN 4B OR
4BA CYLINDER (CASE 4A)

At request of Chief Engineer Felix Smist of Sherwood Selpac, 120 Church St., Lockport, New York 14094, in connection with member plant inspection May 30, 1974, the following fire tests were made on farm property of Customer Service Representative Russell L. Metcalf, just outside Lockport, N. Y.

Three (3) DOT 4BR240 cylinders marked to indicate 238 pounds water capacity, Serial Nos. A00643E, A00642E, and A00644E, manufactured 12-73, containing 100 lbs. propane, and equipped with SHERWOOD SELPAC SAFETY VALVE PV-435-375.

Type of Fire..... Wood-Kerosene

Observers..... Felix Smist, Chief Engineer, Sherwood Selpac
 Russell L. Metcalf, Customer Service, Sherwood Selpac
 Fred Benach, Fireman, Hartland Fire Co.
 Chuck Fuller, Fireman, Hartland Fire Co.
 C. L. Hines, Senior Inspector, Bureau of Explosives

Test Number	Time	#1	#2	#3
-------------	------	----	----	----

		Horizontal cylinder	Horizontal cylinder
Cylinder	Vertical-Valve Up	Valve in	Valve in
		Liquid Phase	Vapor Phase
Fire started	10:10 AM	10:50 AM	11:12 AM
Time at which			
Valve Opened	10:26 AM	10:58 AM	11:17 AM
		First flame about 30 feet maximum length; lasted about 1 minute. for 45 seconds.	First flame about 30 feet maximum length; lasted about 1 minute. for 45 seconds.

Other Valve Reliefs	10:28 AM	10:59 AM	11:19 AM
	10:29 AM	11:01 AM	11:21 AM
	10:30 AM	11:03 AM	11:22 AM
	10:31 AM		11:23 AM
	10:31½ AM		11:24 AM
	10:34 AM		11:25 AM
	10:35 AM		11:25½ AM
	10:36 AM		11:26 AM
	10:39 AM		11:27 AM

Fire extinguished and cylinder definitely empty.....	10:43 AM	11:06 AM	11:31 AM
--	----------	----------	----------

Copy of Sherwood Selpac drawing dated 7-69 of valve PV-435-375 attached.

Pictures of tests attached.

ASSOCIATION OF

AMERICAN RAILROADS

OPERATIONS AND MAINTENANCE DEPARTMENT · BUREAU OF EXPLOSIVES

AMERICAN RAILROADS BUILDING · WASHINGTON, D.C. 20036 · 202/293-4048

67

R. R. MANION
Vice-President

R. M. GRAZIANO
Director

272-1-621
SLF-RM
July 8, 1974

Mr. Felix Smist, Chief Engr.
Sherwood Selpac-A Hill Acme Co.
120 Church St.
Lockport, N.Y. 14094

Dear Mr. Smist:

Reference your request for Bureau of Explosives Approval of Sherwood Selpack Safety Valve PV-435-375.

Be advised that this letter will constitute Bureau of Explosives approval of Valve PV-435-375, for use on DOT 4BW 240 Cylinders containing liquefied Petroleum Gas, maximum capacity 238 pounds water.

If we may be of further service, please advise.

Very truly yours,

S. L. Fastenau for
R. M. Graziano
Director

cc: C. L. Hines, Sr. Inspector

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 6
LIQUEFIED, LOW PRESSURE GAS IN DOT 39
CYLINDER (CASE 4B)

FLOW RATES FOR SAFETY DEVICES FOR DOT-39 VESSELS

The attached test data report from AKO Laboratories on a CGA-1 safety relief device, and a fire test on the same device, are an attempt to correlate the required flow rate as indicated by the formulas in S-1.1, paragraph 4.5 and 4.6, with the actual results obtained in a fire test on a device with a known flow rate.

For purposes of the comparison, a DOT-39 vessel of approximately 50 pounds, W_c , non-insulated, was selected. It was equipped with a CGA-1 safety device, unbacked. It was filled by weight, according to regulations, with R-22 refrigerant gas. The cylinder had a water capacity of 53.25 pounds. The safety device cross sectional diameter is .125".

The formula for non-liquified gas per CGA S-1.1, paragraph 4.5:

$$Q_a = 1.5 \times 10^{-3} \times A_d \times P_t$$

From the above:

$$Q_a = 1.5 \times 10^{-3} \times A_d \times P_t$$

$$Q_a = 1.5 \times 10^{-3} \times \pi \times (.125)^2 \times 100 \text{ psi test pressure.}$$

A liquified gas, paragraph 4.6 of CGA S-1.1 requires:

$$Q_a = 8.2 \times 10^{-4} \times A_d \times P_t / 17 \text{ min.}$$

The attached report from AKO Laboratories shows a flow rate of 18.9 cu. ft./min. This is actually 2.3 times the flow rate required for a non-liquified gas. However, the graph of the pressures taken during the fire test indicate that a rate of 2 times would have also been sufficient.

The origin of air flow capacity requirement docket #595, revision 1950, paragraph 1.1 states: The cross sectional area of a safety discharge channel of safety devices used with non-liquified gasses must be at least .00012 sq. in. for each pound of cylinder water capacity. Per paragraph 2.1 for liquified gases, the cross sectional area must be .00024 sq. in. or twice that required for non-liquified gases.

From the above, the required cross sectional area of the safety device would be:

$$.00024 \times (53.25) = .013 \text{ sq. in.}$$

* Less 15% = 16.1

ON OF

AMERICAN RAILROADS

ONS AND MAINTENANCE DEPARTMENT - BUREAU OF EXPLOSIVES
CENTER - BUILDING 817 - EDISON, NEW JERSEY 08817 - 201/225-1618

CHEMICAL LABORATORY REPORT

MAGNANO
and Chief Inspector

File Number 272-1

THOMAS
DRAFTSMAN

Laboratory Number 65007

Laboratory Date Sept. 1, 1976

FIRE TESTS ON COMPRESSED GAS CYLINDERS AND SAFETY VALVES

LAB NO: 65007

TESTED FOR: Pennwalt Corporation

CYLINDER:

SIZE 18 1/8" H x 12" D

MFG. Pennwalt Corporation

DOT SPEC 39

LOADING Isotron 22 (Refrigerant)

SAFETY VALVE Condon Dwg. No. 64-666A

TESTS:

TYPE OF FIRE Wood/kerosene Fire

OBSERVERS Mr. R. B. Schaefer of Pennwalt Corp., Mr. J. R. Condon of Condon Manufacturing Co., Inc., Mr. R. Jenberg of Pressure Park and Bureau Personnel.

TEST NUMBER	#1	#2	#3
--------------------	-----------	-----------	-----------

POSITION OF CYLINDER	<u>Vertical-valve up</u>	<u>Horizontal</u>	<u>Horizontal</u>
-----------------------------	--------------------------	-------------------	-------------------

TIME AT WHICH VALVE OPENED	<u>1'54"</u>	<u>3'17"</u>
-----------------------------------	--------------	--------------

TEST RESULT Cylinder emptied at 8'58" at 8'27" cylinder emptied at 15'3"

IMPLIES WITH SECTION 173.34(d) The cylinder safety relief device system does comply with the requirement of Section 173.34(d) of the DOT Regulations..

Pressure vs. time for all tests are listed in the attached table.

W. S. Chang
Chief Chemist

Pressure (psi)	Time	Pressure (psi)	Time	Pressure (psi)	Time
200	1'15"	250	48"	250	1'15"
250	1'53"	300	1'7"	300	1'36"
300	2'15"	400	1'36"	400	2'20"
360	2'36"	450	1'54"(VO)	460	2'45"
450	2'59"	325	2'50"	520	----
420	3'13"(VO)	340	3'13"	420	3'17"(VO)
500	4'38"	350	3'50"	340	4'9"
525	6'36"	350	4'46"	250	5'6"
420	7'36"	250	6'13"	200	6'7"
200	8'30"	200	7'5"	150	7'41"
0	9'58"(CE)	100	7'46"	100	10'23"
		0	8'27"	75	12'24"
				0	15'3"(CE)

VO= Valve Open

CE= Cylinder Emptied



AVERY, KRETZMER, OLcott, INC.

P.O.BOX 988

HARTFORD, CONNECTICUT 06101

PLANT LOCATION: BROAD BROOK ROAD, ENFIELD, CONN. 06082

COMPLETE TESTING AND INSPECTION SERVICE

MASS, FORCE, TORQUE, HYDROSTATIC FLOW, PHYSICAL, PROOF TESTING
 MASS SPECTROMETRY LEAK DETECTION, STATIC & DYNAMIC BALANCING
 SCALE & DYNAMOMETER, CALIBRATION, FLUORESCENT PENETRANT & NDT TESTING

CHARGE
TO

Condon Mfg. Co., Inc.
 310 Verge Street
 Springfield, Mass. 01129

SHIP
TO

OUR LAB #	YOUR REFERENCE	SHIPPED FROM	VIA	SHIPMENT COMP PART	DATE	INV. DATE
14877	NO. Jim Condon	Enfield, Conn.	yt	X	8-25-77	

QUANTITY

PART NO.

DESCRIPTION

PARTS CONFORMING

PARTS NOT CONFORMING

1

649 with 666 Disc

Valve Assy.

METHOD USED:

Valve assemblies were installed in an air flow rig with flow rates being precisely measured using critical flow nozzles. Inlet pressure to valve assembly was maintained @ 100 PSIG or 114.7 PSIA. Knowing the size of the critical flow nozzle and its inlet pressure, flow can be calculated in lb./min.

RESULTS:

649 Valve Assy.- @ 100 PSIG, $W = 1.38 \text{ lb/min}$, $P = .0728 \text{ lb/Ft}^3 \text{ ATM.}$, therefore Flow rate $18.95 \text{ Ft}^3/\text{min}$.

Should be @ 100 PSIA \therefore Flow is 16.25

EQUIPMENT USED:

Critical Flow Nozzles:

S/N 7496 .070 Dia.
 S/N 7861 .091 Dia.

Pressure Gages- 0-125 PSI CM 9164
 0-100 PSI USG S/N 1

The above parts have been carefully tested in accordance with above methods. This inspection is limited to defects disclosed from above method only. OUR LIABILITY NOT TO EXCEED COST OF RE-INSPECTION OR RE-TEST.

RESPECTFULLY SUBMITTED,

Certification No. 15096

(Seal)

Subscribed and sworn to before me
 this day of 19

Notary Public

M. Commission #A1000

51J

Inspector

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 7
LIQUEFIED, LOW PRESSURE GAS IN DOT 39
CYLINDER (CASE 4B)

BUREAU OF EXPLOSIVES

ASSOCIATION OF AMERICAN RAILROADS

REPORT FROM CHEMICAL LABORATORY

T. C. GEORGE, DIRECTOR AND CHIEF INSPECTOR
C. W. SCHULTZ, CHIEF CHEMIST

FILE NUMBER..... 272-8
LABORATORY NUMBER..... 60447

EDISON, N. J., March 14, 1969 196

Fire Test on Cylinder

PENNSALT CHEMICALS CORPORATION

A cylinder of compressed gas was brought to the laboratory by Mr. Robert Schaefer of Pennsalt Chemicals Corporation of Philadelphia, Pa.

The cylinder was identified as Worcester A-10669 and was rated at 125 pounds water capacity. Details of materials, construction etc. are shown on the attached specification sheets.

The cylinder was equipped with two Superior #6408 valves, each said to be approved for 55 pound water capacity cylinders. One valve opened directly into the cylinder and the other was attached to an eduction tube which extended close to the bottom of the vessel.

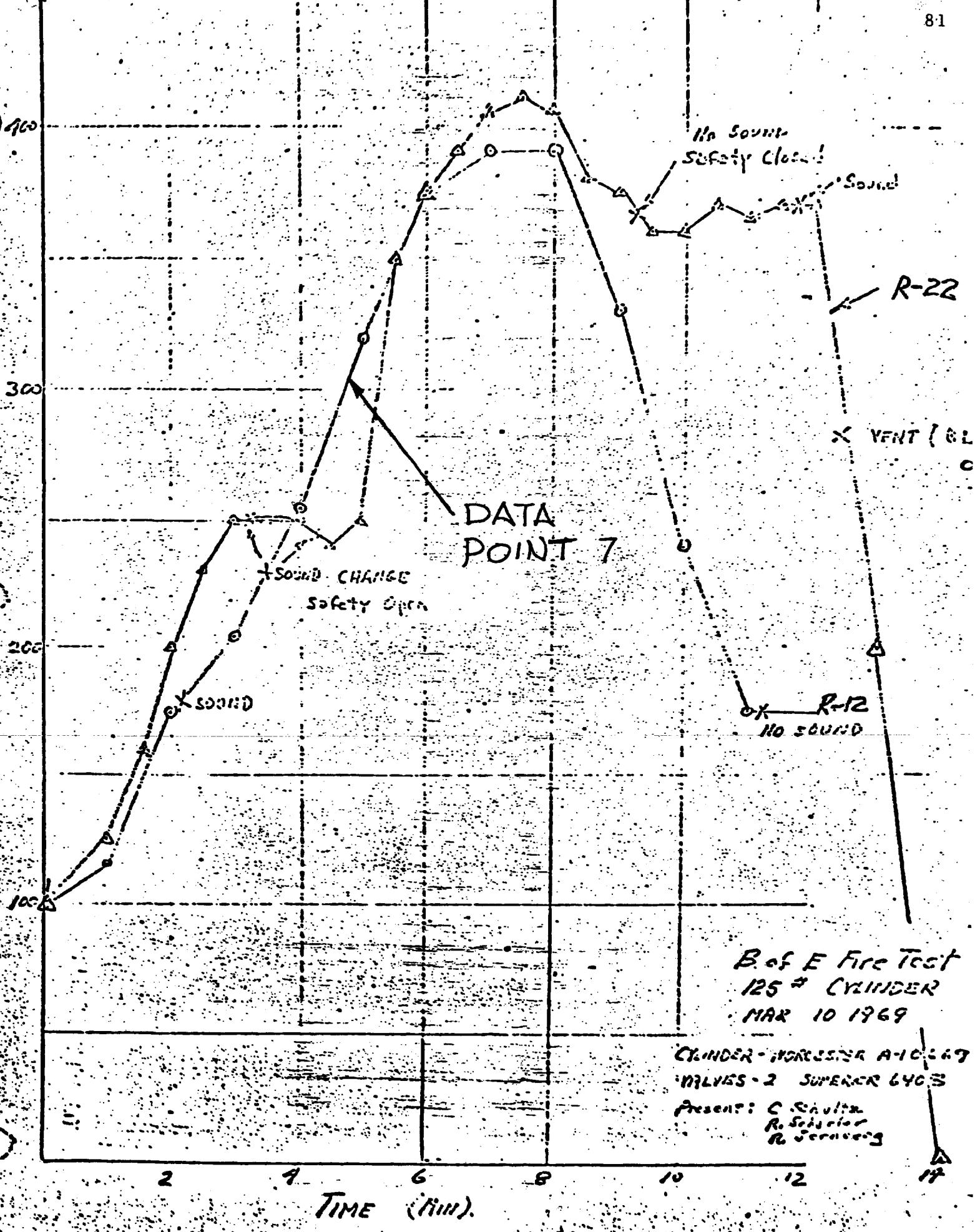
The cylinder was charged to a filling density of 116 percent with Isotran 12 (dichlorodifluoromethane).

During the testing a pressure gage was attached to the vapor valve by means of 100 feet of 1/4" copper tubing.

The cylinder was placed in an upright position in the steel mesh cage on the testing grounds and a wood-kerosene fire kindled around and beneath it.

Two minutes after the fire was ignited there was the sound of escaping gas. The cylinder was empty 9 minutes later.

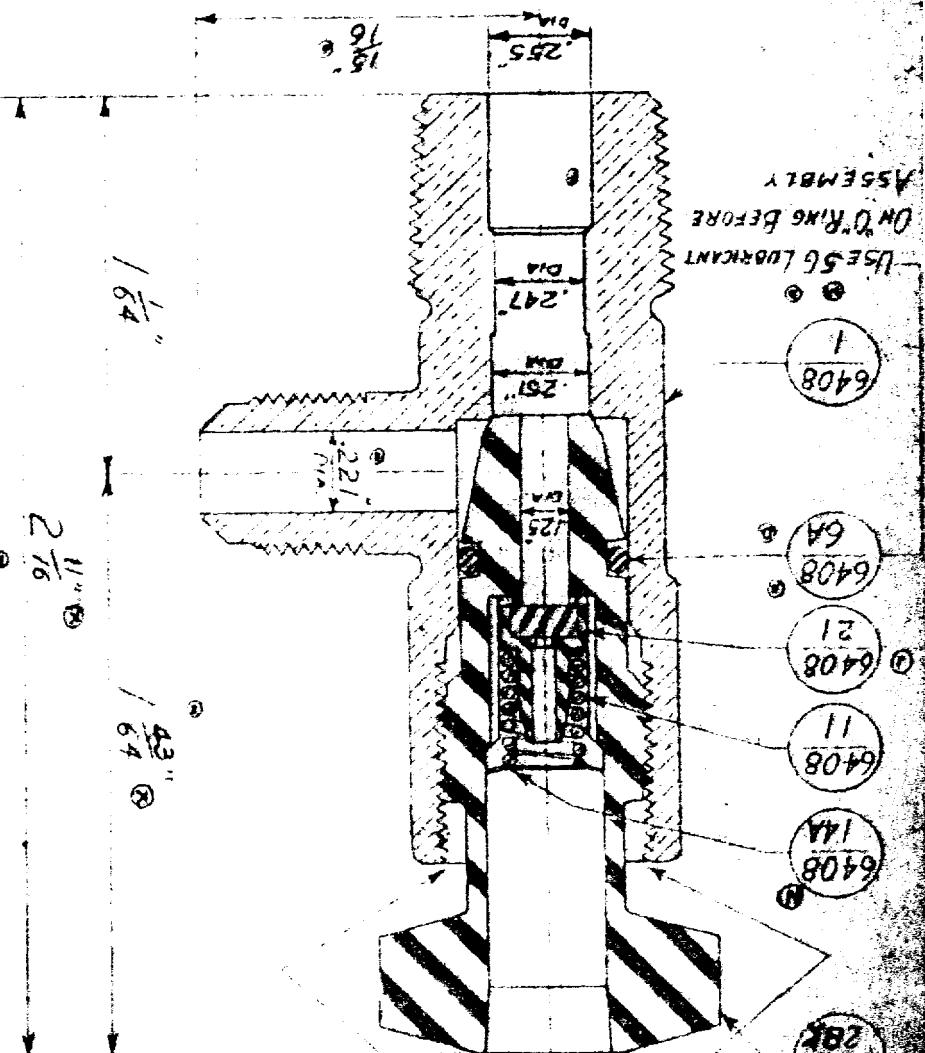
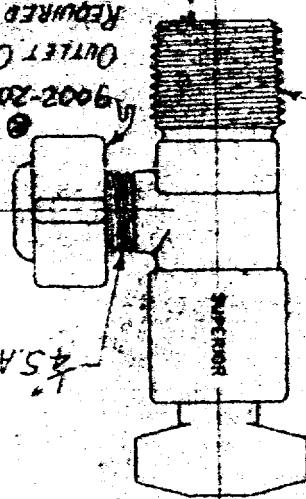
The maximum pressure of 390 psig was reached 8 minutes after the fire was started. A pressure time curve is shown on the attached sheet.



PATENT 3,554,227 SAFETY DEVICE SETTING 360-480 PSI

TYPE SD 85 SAFETY DEVICE (DWG. NO. 1956) APPROVED BY BUREAU OF EXPLOSIVES
LETTER 272-1-611, BA-768, W-D, DATED MARCH 4, 1968 FOR CRYLINDERS
CONTAINING LIQUIFIED COMPRESSED GAS HAVING A MAXIMUM WATER CARACITY
OF 55.6 POUNDS

ACTUAL SIZE



BLACK SYSTEM

PEEN THREE AD APPROPRIATELY AFTER ASSEMBLY FOR
 SKINING EFFECT TO INSURE AGAINST NANDERTANT
 STEM REMOVAL. FEENING OPERATION TO LIMIT
 TRAVEL TO $\frac{1}{2}$ - $\frac{2}{3}$ TURNS FROM CLOSED POSITION.

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 8
LIQUEFIED, LOW PRESSURE GAS IN DOT 39
CYLINDER (CASE 4B)

BUREAU OF EXPLOSIVES

ASSOCIATION OF AMERICAN RAILROADS

REPORT FROM CHEMICAL LABORATORY

T. C. GEORGE, DIRECTOR AND CHIEF INSPECTOR

C. W. SCHULTZ, CHIEF CHEMIST

FILE NUMBER.....272-8.....

LABORATORY NUMBER.....60448.....

EDISON, N. J., March 14, 1939

Fire Test on Cylinder

PENNSALT CHEMICALS CORPORATION

A cylinder of compressed gas was brought to the laboratory by Mr. Robert Schaefer of Pennsalt Chemicals Corporation of Philadelphia, Pa.

The cylinder, valves and test procedure were identical with those reported under Laboratory Number 60447.

The cylinder in this case was charged to a filling density of 94 percent with Isotron 22(monochlorodifluoromethane).

The maximum pressure of 410 psig was reached about 7 1/2 minutes after the fire was started and the cylinder took 14 minutes to empty.

As in the previous test, the bottom part of the vessel gave evidence of having been heated very strongly while the upper part which contained the valves still had undiscolored paint on it. In this test the plastic inner part of the valve attached to the eduction tube melted out.

The cylinder tested complied with §173.34(d) of the Department of Transportation Regulations.

C. W. Schultz

(JAD)

WILSON AVAIL

 Package Spec. No. 19-113X
 Date Modified 6/18/70 88
 Reason

Division

CONTAINER TYPE	Steel Cylinder - 125 Lb. Disposable		
CAPACITY	125 Lb. Nominal Nominal W _c -130 Lb.	Overflow	3,600 cu. in
OUTER PACKAGE (If Any)			
REF. SPEC	UFC Rule	Net Wt. Limit	
	DOT # 6024		
PHYSICAL SPECS	Dimensions: Inside Overall Tare Wt: Body 32 lb. Export Cube:	Length (or Diam.) 15-1/4	Width Height 24-1/2 (ma) 21-3/4
			Min. Thickness .062

MATERIALS & CONSTRUCTION (Burst test, Plies, Ga., etc.)
 Girth-welded drawn shells of aluminum killed low carbon (.09 max.) steels to meet all construction, testing, and marking requirements as per specification 39, except size. Cylinder must be clean, dry, and free from any foreign material. Min. Burst pressure to be 650 psi average 750-800. Cylinder must be capable of withstand a 3 ft drop in any position onto solid concrete when 98% full of water without damage to valves. Each cylinder as filled for shipment must be submerged or tested by equally efficient means without evidence of leakage.

<u>CLOSURE VALVES</u>	For Refrigerant * LATER IDENTIFIED AS 6400x4 Superior XP784 with thread outlet seal SSW 1604-167X Each valve equipped with safety relief set at 390-520 psig and fuse plug with total flow capable of preventing cylinder rupture in standard B of E fire.
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<u>LINING</u>	
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<u>PRINTING MARKING</u>	Rubber or metal stamp lot No. as follows: 041667-1 (No., Day, Yr., lot) on handle.
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<u>PAINTING</u>	Paint one coat gloss white, green, or other color per order Decorate by silk screen or label as per order
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<u>PACKING</u>	TL	CL	Miscellaneous
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TYPICAL PRODUCTSUSED AT

SUPERIOR VALVE COMPANY

2200 NORTH MAIN ST., WASHINGTON, PA. 15301

August 13, 1970

Mr. Robert B. Schaefer
Manager, Packaging
Pennwalt Corporation
Pennwalt Building
Three Parkway
Philadelphia, Pa. 19102

Dear Bob:

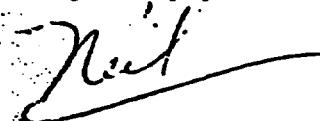
Attached is a copy of our drawing 640SX4 (8/11/70), showing the valve and cap tube we recently supplied to you for your 125# refrigerant containers.

Also, attached is a copy of our drawing 1958 (8/11/70) illustrating our type SD 87 safety device which is the fusible metal safety only. The attached copy of the Bureau of Explosives' letter dated August 3, 1970, gives approval of this device.

When used in your particular application, the combined safety capacities of our 6408 spring-loaded safety and the new poured-in fusible metal safety gives a combined water capacity of 137#. This means that the container can hold a total of 143.85# of Refrigerant 22 or 163# of Refrigerant 12.

If you have any questions regarding this please let us know.

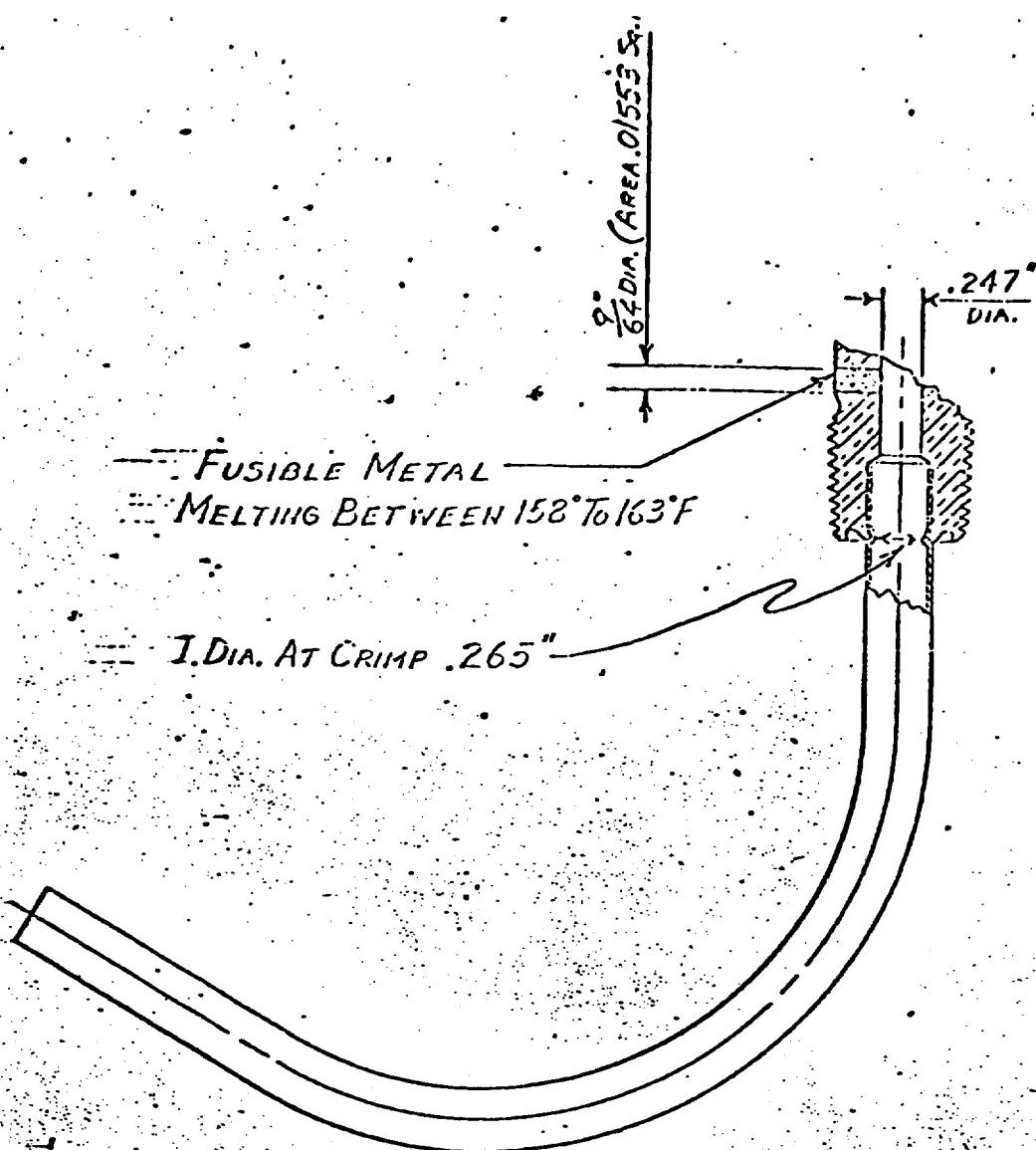
Very truly yours,



F. N. Robson
Vice President - Sales

rgd/Y

Encls.



TYPE S.D. 87 SAFETY DEVICE (Dwg. No. 1958 ON FILE WITH BUREAU
OF EXPLOSIVES, FILE 272-1-61; BA-1029 DATED AUG. 3, 1970
FOR USE ON LIQUEFIED COMPRESSED GAS CYLINDERS HAVING
WATER CAPACITIES NOT EXCEEDING 81.4 POUNDS

FOR DIMENSIONS
THOSE SPECIFIED

SUPERIOR VALVE COMPANY
WASHINGTON, PA.

I.DIA. LENGTH
 $\pm .002$ $\pm .005$
 $\pm .005$ $\pm .010$

TYPE S.D. 87 SAFETY DEVICE

DRAWN BY HOLLIS	DATE 7-17-73
CH'KD. BY JULIE	SCALE FULL

DRAWING NO.

1958

PART NO. OR CATALOG NO.

REVISIONS

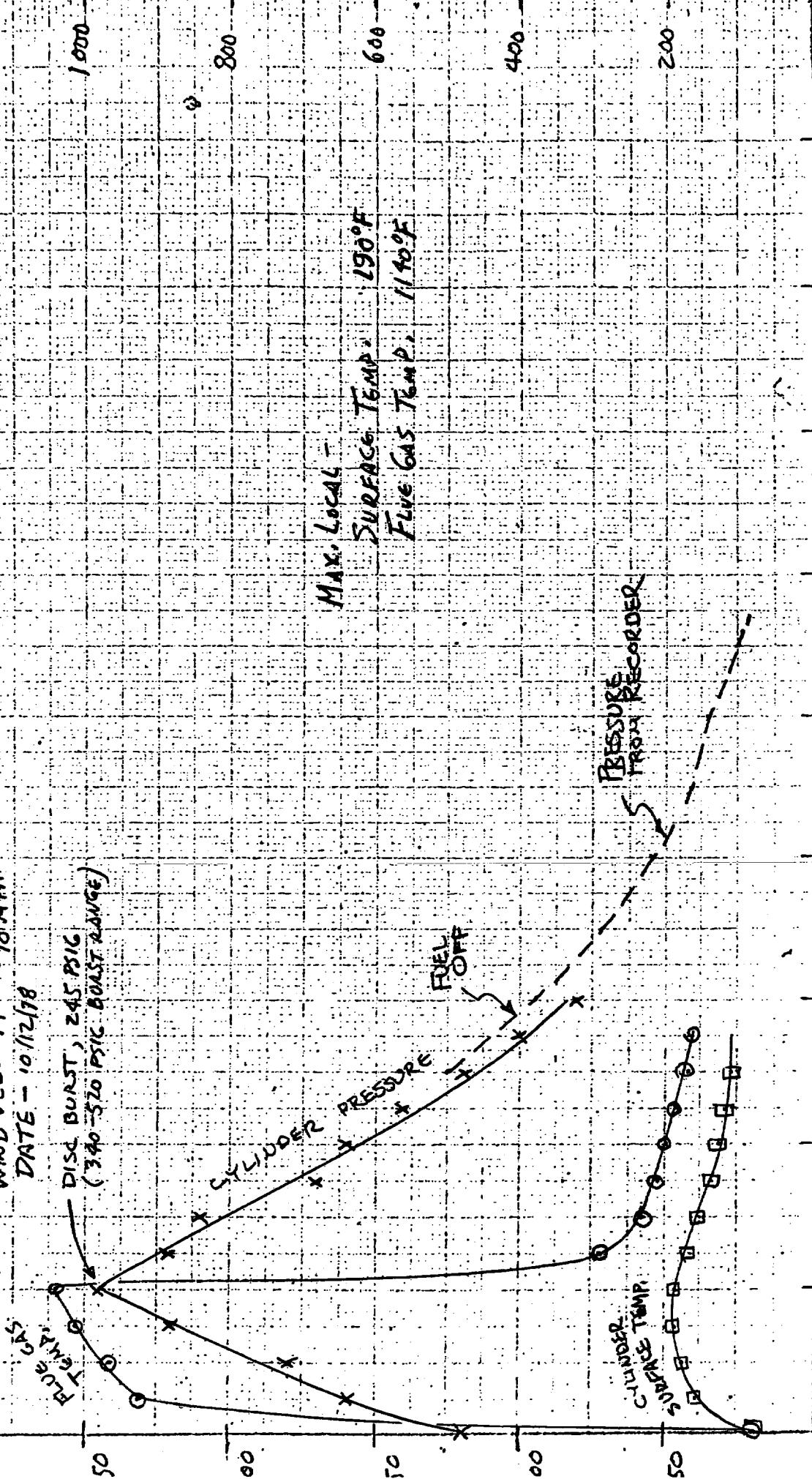
DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 9
LIQUEFIED, LOW PRESSURE GAS IN 4E
CYLINDER (CASE 4C)

CYLINDER PRESSURE (PSIG)

FIRE TEST DATA, BUREAU OF EXPLOSIVES

CYLINDER PRESSURE, CYLINDER SURFACE AVERAGE TEMP.
 FLUE GAS AVERAGE TEMP. VS TIME AFTER START OF TEST
 CYLINDER TYPE - DOT T-240 ALUMINUM
 CYLINDER CONTENTS - 50 LBS R-22
 VALVE TYPE - CONDON C49-G66 WITH CC-1
 TEST RUN - 7 (CASE #C), VERTICAL
 AMBIENT TEMP ~75°F
 WIND VELOCITY ~10 MPH
 DATE - 10/12/78

DISC BURST? 245 PSIC
 (340-520 PSIC BOAST SURGE)

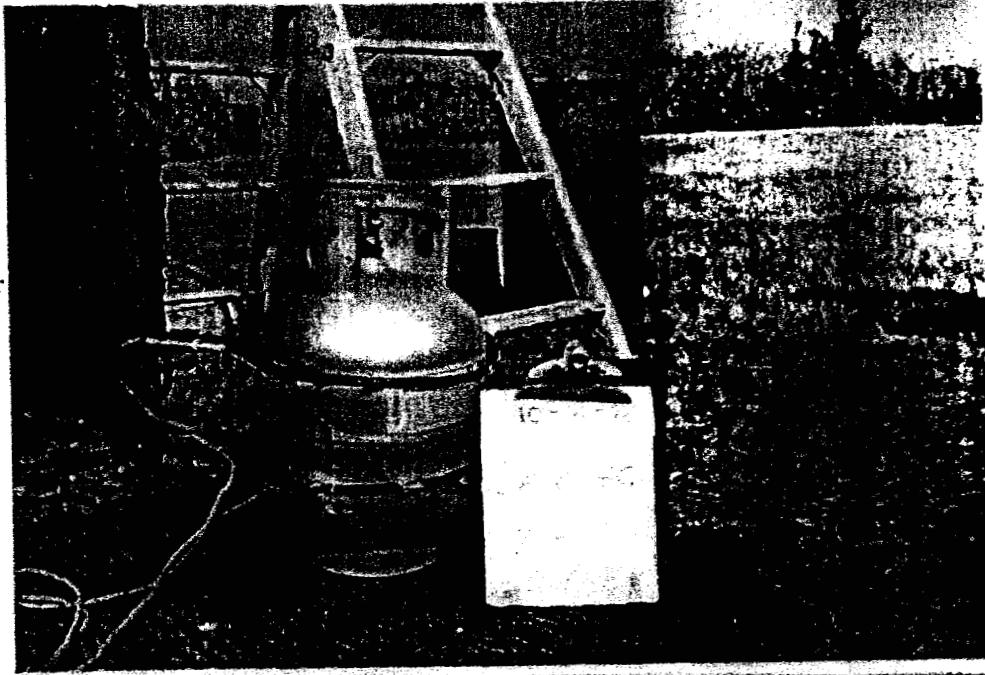


31

DOT 4E240 Aluminum Cylinder

(Worthington), R-22

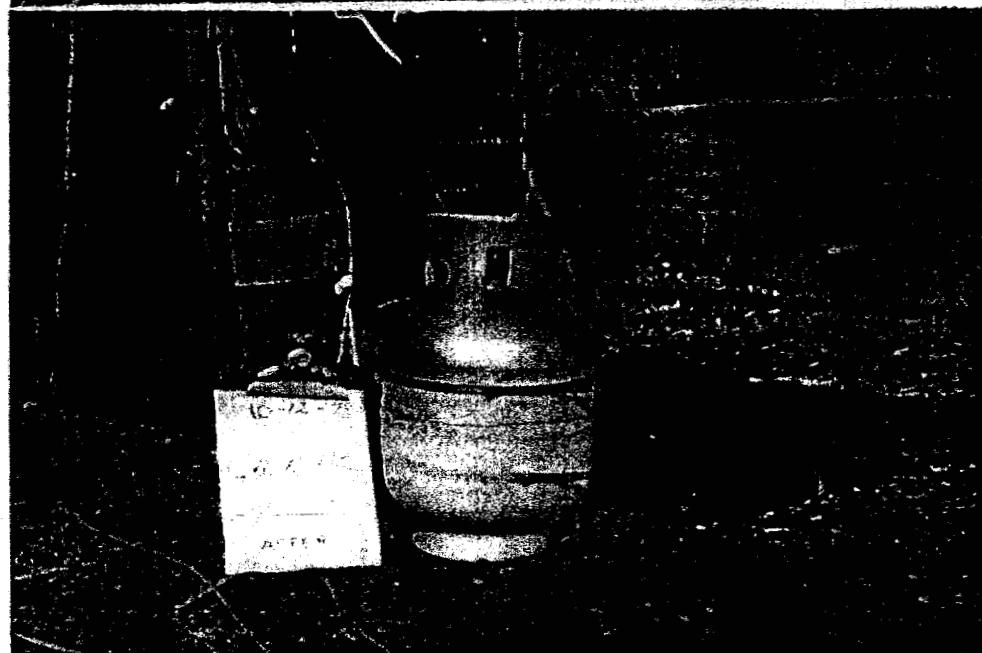
before start of Test-7



32

Cylinder after Test-7

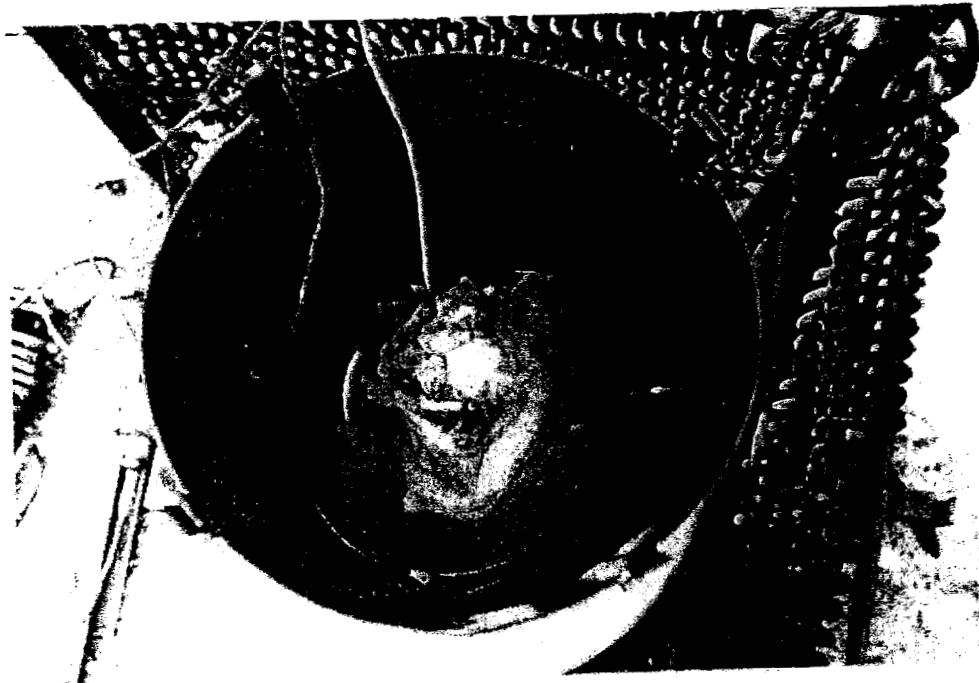
(Note frosted surface)

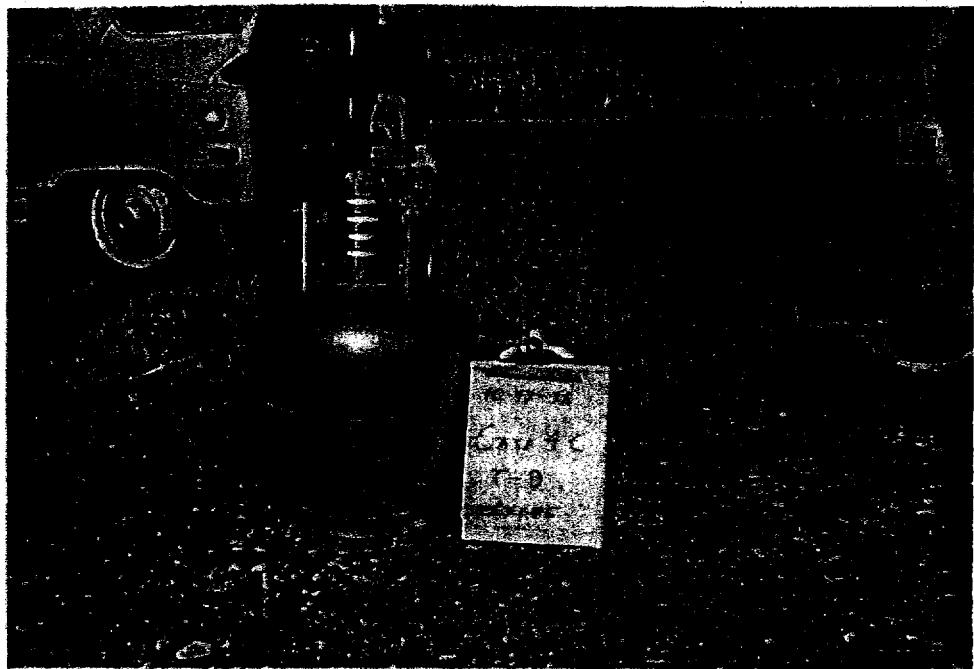


33

Looking down chimney

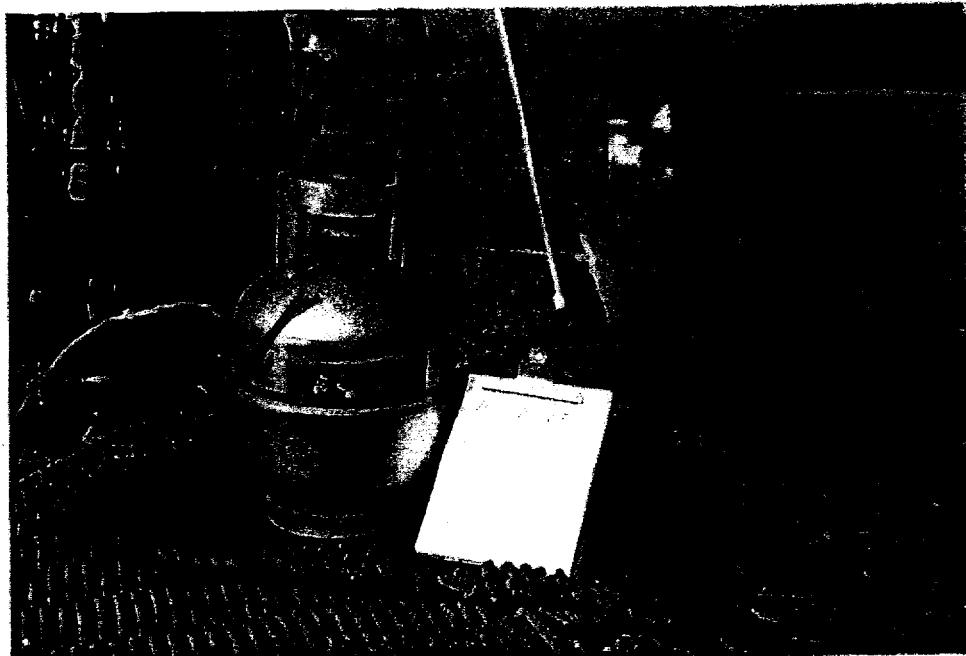
before Test-8 on insulation
used in attempt to shroud
exhausting R-22 during test





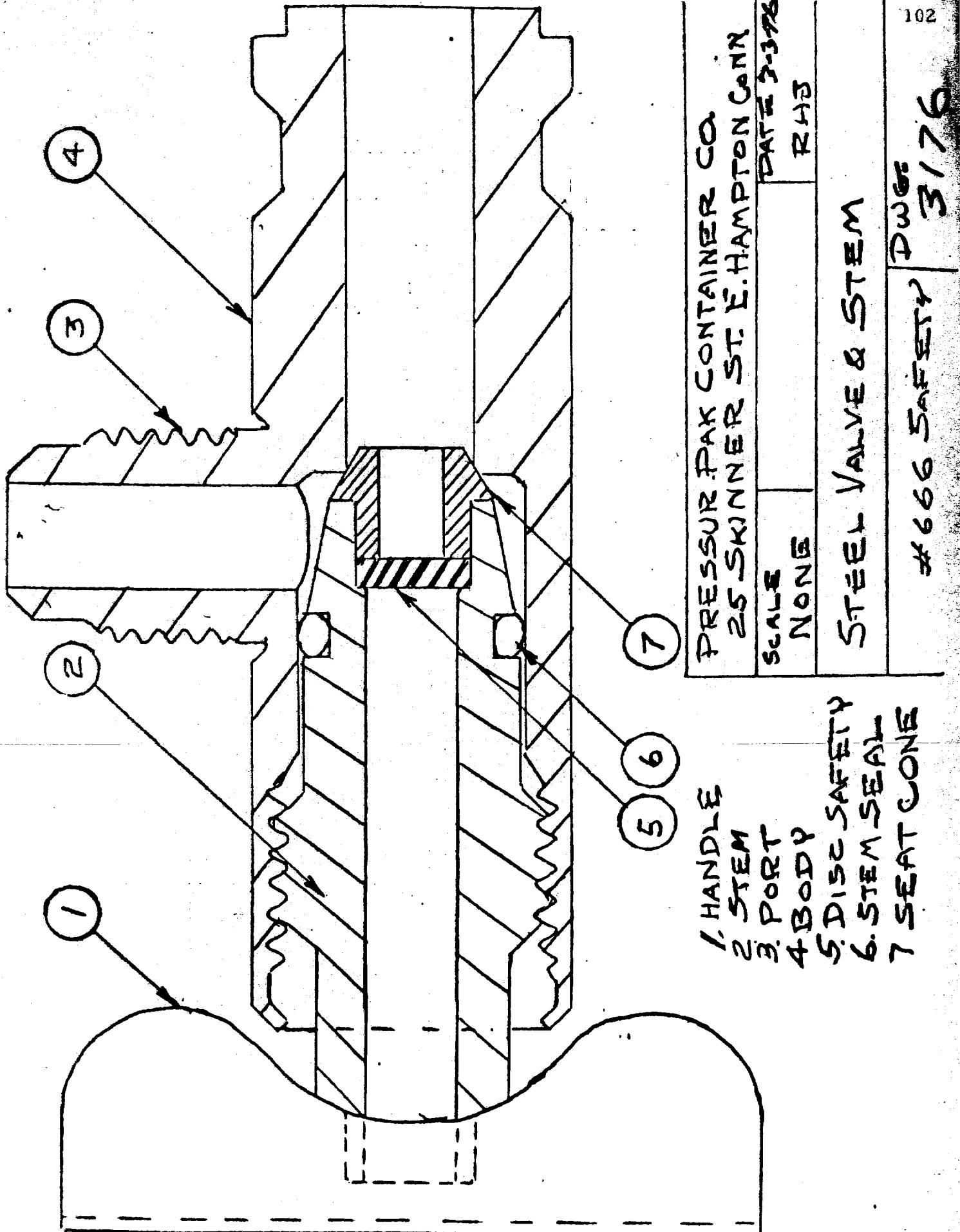
35

DOT 4E240 Aluminum Cylinder (Worthington), R-22,
before start of Test-9 with baffle around valve



36

Cylinder after Test-9 (Note surface not frosted)



DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 10
LOW PRESSURE, CRYOGENIC GAS IN 4L
CYLINDER (CASE 5)

COMMITTEE CORRESPONDENCE

COMMITTEE CGA Safety Device

ADDRESS WRITER CARE OF:

SUBJECT: Fire Test of Insulated Cylinder
with Aluminum Jacket

Union Carbide Corporation
Linde Division
Old Saw Mill River Road
Tarrytown, N.Y. 10591

TO: W. Kalaski

DATE: November 10, 1978

cc: F. Huber, Jr.
R. O. Tribblet

Dear Bill:

Attached per your request are the following:

1. 10 copies each of Photos 337-72 and 345-72 showing the cylinder before and after fire test.

NOTE: A 1/16" aluminum disk x 17-1/4" diameter was placed above the piping (except for the valve stem) prior to fire test. Note that the entire aluminum jacket and shroud melted during the fire test, as well as a portion of the insulation. The stainless steel inner vessel was intact after the fire test.

2. 10 copies of Photo 350-72 showing piping after fire test. Note that all but the inlet part of the CG-1 device is missing.

3. 10 copies of a plot of pressure versus time for the test. Temperature readings were not recorded for this gasoline-on-water pan fire.

4. 10 copies of B77-LIN-024. Rated burst pressure was 175 psi @ 72F.

I am also enclosing the copy of the October 30, 1978 Fire Test Data.

Paul E Loveday
Paul E. Loveday

PEL/mbb



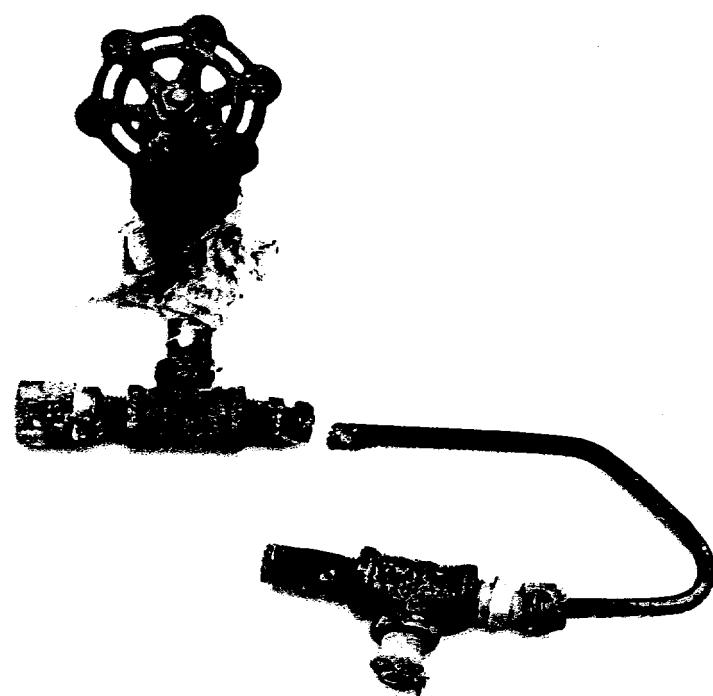
337-72



345-72

**337-72 DOT 4L, Aluminum Cylinder, Insulated
(Liquefied O₂) before start of test.**

345-72 Cylinder after test



350-72 Piping after test

350-72

COMMITTEE CORRESPONDENCE

COMMITTEE CGA Safety Device

ADDRESS WRITER CARE OF:

Union Carbide Corporation
Linde Division
Old Saw Mill River Road
Tarrytown, N.Y. 10591

SUBJECT: Data re Insulated Cylinder
Fire Test Point 19

TO: William Kalaskie

DATE: September 27, 1978

cc: R. O. Tribblet

Attached in support of the Point 19 fire test are the following:

1. The Appendix A forms including test data.
2. BS&B Drawing 77-LIN-024.

It should be noted that the cylinder tested was not stamped as a DOT-4L cylinder, since it had an aluminum jacket. As expected, substantial deterioration of the jacket occurred during the test, as well as some deterioration of the insulation.

The cylinder contained 38 lbs. of pressurized liquid oxygen at the start of the test. The initial pressure was 42 psig, and increased to a maximum of 65 psig during the fire test. (Water capacity of cylinder was 42 lbs.).

The most restrictive flow area of the CG-1 device was 1/4 inch diameter, providing an area of 0.0491 sq. inches.

Based on the latest S-1.1 Revision approved by the CGA Safety Device Committee there are several options by which the device can be qualified. By 4.9.2(e), the fire test result shows that the full-scale cylinder has adequate protection with the CG-1 device used. An alternate approach is to size the device per 4.9.2(a):

$$Q_a = G_u A^{0.82} = 60(4.0)^{0.82} = 189 \text{ CFM}$$

Converting to the area required:

$$* a = q^1 m \sqrt{Sg(T)/260P^1}$$

where: a = required flow area, in.²

$q^1 m$ = flow rate, CFM at 60F and 14.7 psia.

Sg = specific gravity of gas relative to air.

T = temperature, R.

P^1 = pressure, psia.

$$a = 189 \sqrt{1(520)/260(189.7)} \\ = 0.0874 \text{ in.}^2$$

In the Appendix A summary, please disregard the Minimum Required Flow, since the requirements of paragraph 4.6 of the 1969 Edition of S-1.1 were applied.

Contact me if you need additional information.

Paul E. Loveday
Paul E. Loveday

PEL/mbb

*Formula from BS&B Publication No. 77-650.

APPENDIX A (Continued)

TEST DATA

This Form is suitable for Test Data using Orifice Meters.

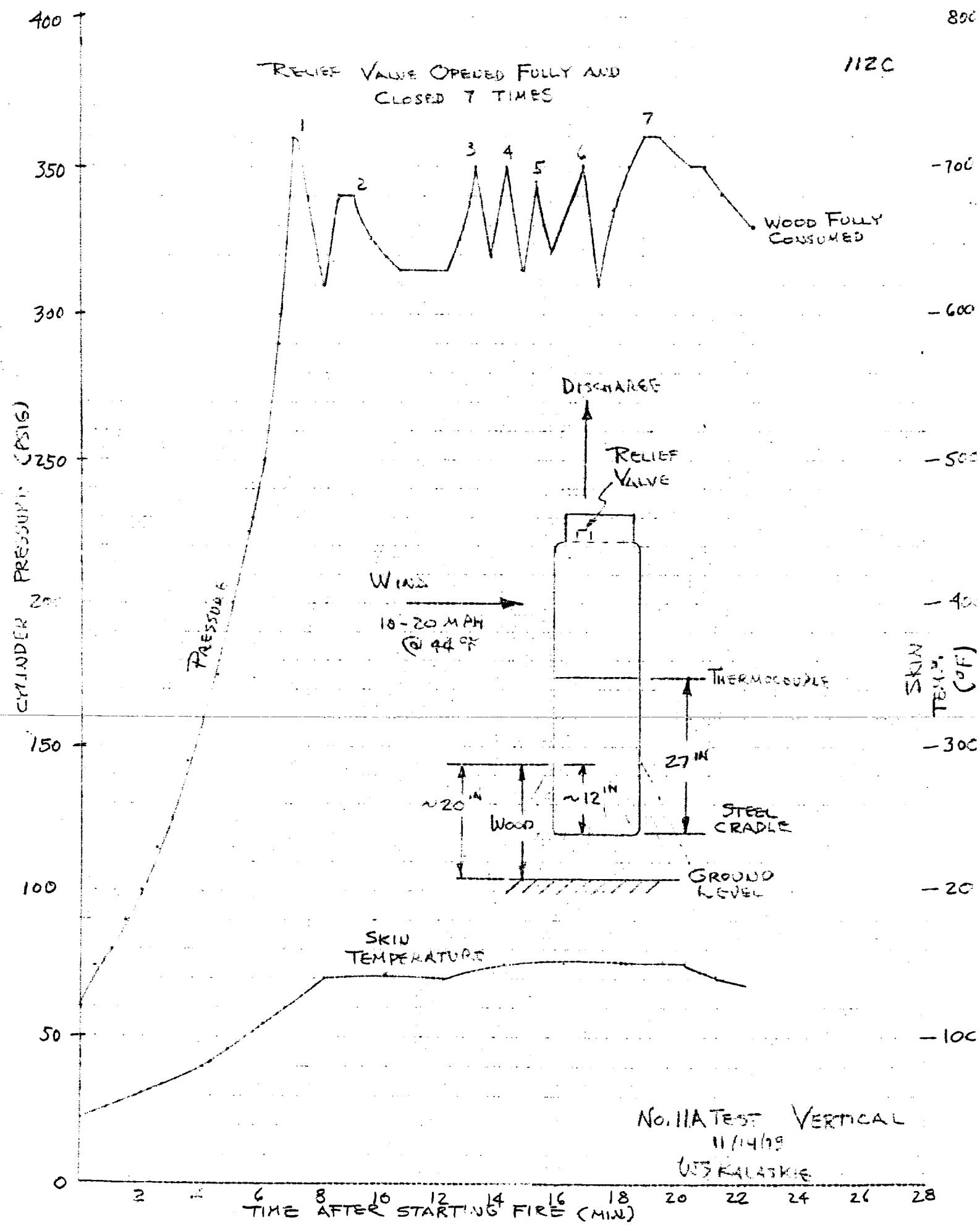
Test Medium-Air Air or Name of Gas Specific Gravity _____

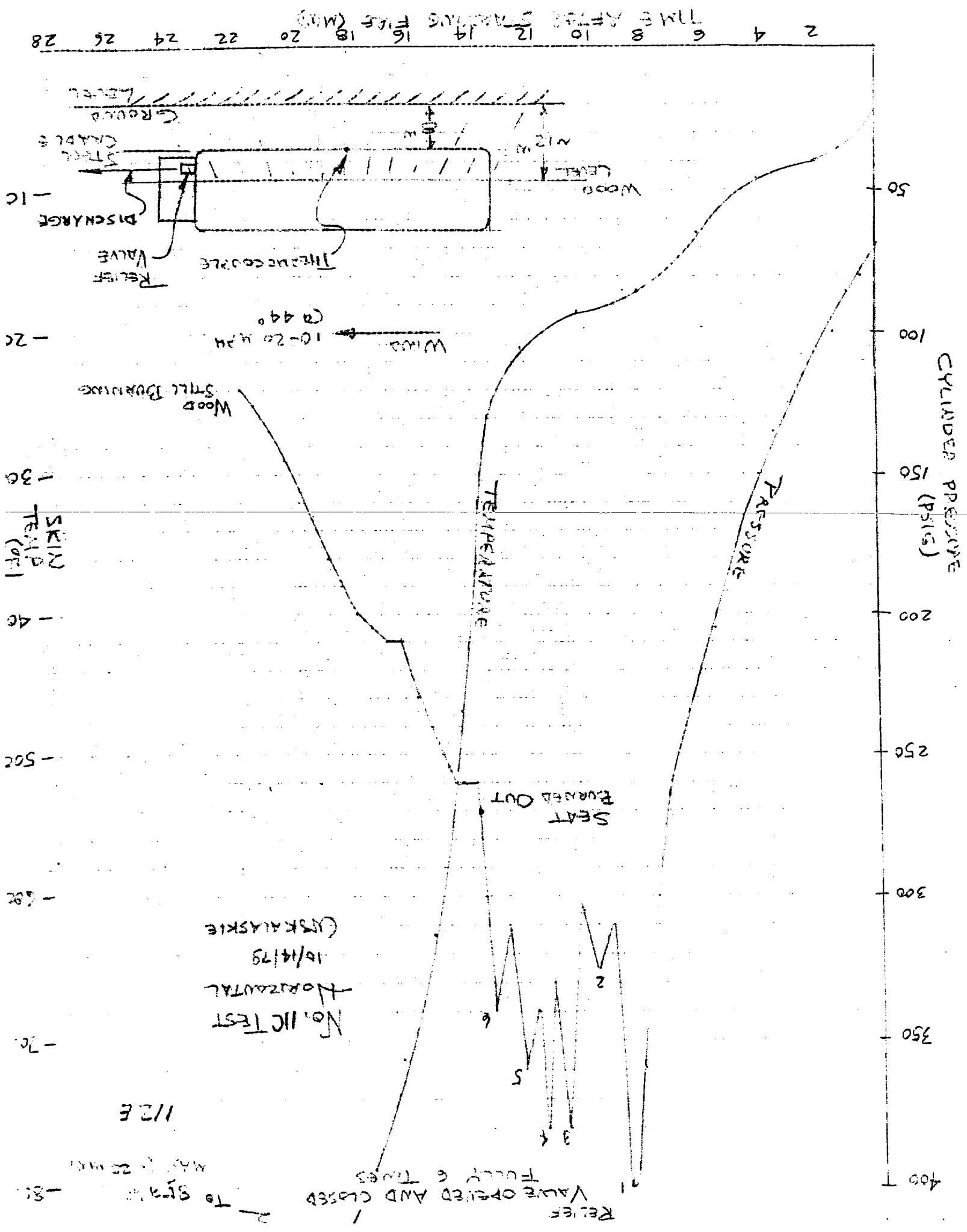
Molecular Weight 28.96 Ratio of Specific Heats (k) 1.40 BS & B

ITEM	SAMPLES	1	2	3
1. Start to Discharge Pressure—psig.				
2. Resealing Pressure—psig.				
3. Frangible Disc—Bursting Pressure—psig.	180	190	188	
4. Fusible Plug—Yield Temperature—degrees F.				
5. Flow Rating Pressure—psia. (psig + 14.7)	189.7	189.7	189.7	
6. Orifice Diameter—Inches	.6518	.6518	.6518	
7. Meter Pipe—Inside Diameter—Inches	2.067	2.067	2.067	
8. Orifice Factor (For Flow in CFM.) See Table 3	.4519	.4519	.4519	
9. Constant (Item 8 x $\sqrt{Item\ 5}$)	19.997	19.997	19.997	
10. Differential Pressure— $\sqrt{\text{Inches Water}}$	7.0	7.0	7.04	
11. Flow Temperature—degrees F.	67	67	67	
12. Temperature Correction Factor. See Table 2.	.9933	.9933	.9933	
13. Supercompressibility Factor (Air = 1.0)	.995	.995	.995	
14. Gas Constant Ratio(*)	1	1	1	
15. Flow (Items 9 x 10 x 12 x 13 x 14)	138.3	138.8	139.14	
16. AVERAGE FLOW AT 60 F and 14.7 psia	138.75	CFM		

(*) Gas constant ratio for air = 1.0; for other than air = 356/Gas Constant (C). See Figure 1.

DATA PACKAGE
AND
FIRE TEST BACKGROUND INFORMATION
FOR
DATA POINT 11
LIQUEFIED, LOW PRESSURE GAS IN DOT 4BW240
CYLINDER (CASE 4A)



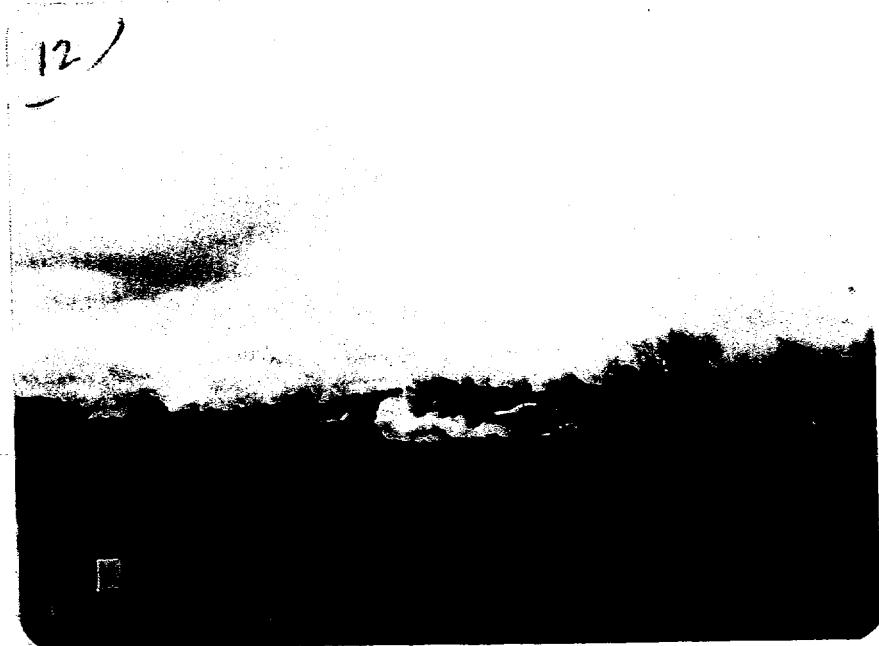


112H



Test 11A

Relief Device Actuating
For First Time



Test 11B

Relief Device Actuating
For First Time



Test 11C

Relief Device Actuating
For First Time

SUPERIOR VALVE COMPANY
Washington, Pa. 15301

Date NOVEMBER 12, 1979
Catalog or Model No. 435A

TEST DATA

This Form is suitable for Test Data using Orifice Meters.

Sherwood Selpac Special
Relief Valves for 100 lb
Propane Cylinders

Test Medium - Air

Specific Gravity 1.0

ITEM	SAMPLES		
	1	2	3
1. Start to Discharge Pressure—psig.	380	381	
2. Resealing Pressure—psig.	350	353	
3. Frangible Disc—Bursting Pressure—psig.	—	—	
4. Fusible Plug—Yield Temperature—degrees F.	—	—	
5. Barometric Pressure—psia.	14.4	14.4	
6. Flow Rating Pressure—psia. (psig + Item 5)	494.4	494.4	
7. Orifice Diameter—Inches	.8130	.8130	
8. Meter Pipe—Inside Diameter—Inches	3.068	3.068	
9. Flow Pen Reading—Units	7.36	7.59	
10. Chart Factor (For Flow in CFM)—CFM/Unit	50	50	
11. Assumed Flowing Pressure for which Orifice was Bored—psia.	494.4	494.4	
12. Pressure Correction Factor = $\sqrt{\frac{\text{Item 6}}{\text{Item 11}}}$	1.0000	1.0000	
13. Flow Temperature Pen Reading—°F	• 44	42	
*14. Temperature Correction Factor to 60° F	1.0158	1.0178	
*15. Flow (Items 9 x 10 x 12 x 14)—SCFM.	373.8	386.3	
16. AVERAGE FLOW AT 60° F and 14.7 psia.			

* Flow Temperature Correction Factor taken from Page 281, Principles and Practice of Flow Meter Engineering by L. K. Spink.

** Density Correction, Supercompressibility and Gas Constant Factors for Air = 1.0

ASSOCIATION OF

AMERICAN RAILROADS

OPERATIONS AND MAINTENANCE DEPARTMENT · BUREAU OF EXPLOSIVES
RARITAN CENTER · BUILDING 817 · EDISON, NEW JERSEY 08817 · 201/225-1618

112L

CHEMICAL LABORATORY REPORT

R. M. GRAZIANO
Director and Chief Inspector

W. S. CHANG
Chief Chemist

File Number 272-1-206
Laboratory Number 67019
Laboratory Date January 16, 1980

FIRE TESTS ON COMPRESSED GAS CYLINDERS AND SAFETY VALVES

Lab No: 67019

Tested For: Sherwood Selpac, Lockport, NY -

Cylinder:

Size 14 3/4" (OD) x 49½" (H)

Mfg. Lee Cylinders

DOT Spec. 4BW240

Loading 100 lbs. Liquefied Petroleum Gas (Propane) (239" WATER CAPACITY)

Safety Valve Sherwood Selpac Dwg. No. PV 435A (RELIEF VALVE WAS SPECIFICALLY SIZED TO MEET PAMPHLET S.I.I FOR 239" WATER CAPACITY)

Tests:

Type of Fire Kerosene/Wood

Observers Felix Smist, Sherwood Selpac, W. S. Kalaskie, Superior Valve, Robert Jernberg, Pressure Pak, C. L. Hines, Sr. Inspector (B of E).

<u>Test Number</u>	<u>1</u>	<u>2</u>	<u>3</u>
--------------------	----------	----------	----------

<u>Position of cylinder.</u>	<u>Vertical (Valve Up)</u>	<u>Horizontal</u>	<u>Horizontal</u>
------------------------------	----------------------------	-------------------	-------------------

<u>Time at which valve opened.</u>	<u>7 min. 30 sec.</u>	<u>6 min. 30 sec.</u>	<u>8 min. 30 sec.</u>
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<u>Test Result</u>	<u>22-23 min.</u>	<u>13 min.</u>	<u>17 min. 30 sec.</u>
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Cylinder emptied at

Complies with Section 173.34(d) Yes

W. S. Chang
Chief Chemist

E. CONCLUSIONS

1. Since all pressure relief devices were intentionally sized to the minimum allowed by S-1.1 formulae with no test failures, the test results show that the formulae are valid regardless of state of gas, high or low pressure, metallurgy and method of fabrication.
2. Chimney fires are reproducible and controllable.
3. It is necessary that the fire be maintained for any gas after actuation of the relief device until the pressure is negligible or until ten minutes has elapsed.

F. RECOMMENDATIONS

1. * Provisions must be made to ensure that the fire is maintained after relief device actuation.
2. * Provisions must be made to ensure good reproducible reignition in the event the fire is extinguished before the test is completed.
3. * Two of the four thermocouples specified in the fire test procedure should be attached to the cylinder to record surface temperature at two elevations. The remaining two should be located diametrically opposite in the flue gas stream. This is preferable to all four thermocouples being located in the flue gas.
4. * The surface thermocouples should be insulated from the flue gas.
5. CGA Pamphlet S-1.1 should be used, by reference of CFR-49 171.7 as a means for selecting and sizing pressure relief devices.

* These recommendations were implemented during these fire tests.